From: Zuck, Penelope - AMS
To: Mann, Renee - AMS
Subject: Accepted: ETKO

From: Mann, Renee - AMS

To: Lopez, JasonJ - AMS; Mann, Renee - AMS
Subject: Conversation with Lopez, JasonJ - AMS
Date: Friday, December 18, 2015 9:37:09 AM

Mann, Renee - AMS 9:33 AM:

Hi Jason, please forward the Canada/ETKO emails to me (the ones Cheri sent you)

Lopez, JasonJ - AMS 9:33 AM:

OK

Mann, Renee - AMS 9:37 AM:

Thanks.

From: <u>McEvoy, Miles - AMS</u>

To: McEvoy, Miles - AMS; Mann, Renee - AMS
Subject: Conversation with McEvoy, Miles - AMS
Date: Friday, December 11, 2015 10:59:12 AM

McEvoy, Miles - AMS 10:46 AM:

Hi Renee - do you know when AIA will have a draft of the ETKO proposed suspension and settlement?

Mann, Renee - AMS 10:47 AM:

I don't know - Penny is working on that and she's been out on an audit all this week. Probably next week. We can make it a priority. I know you're leaving on vacation.

Miles McEvoy 10:47 AM:

ok, thanks

Yes, it would be good to get it out next week

Mann, Renee - AMS 10:47 AM:

OK, I'll let Penny know.

From: Mann, Renee - AMS

To: Zuck, Penelope - AMS; Mann, Renee - AMS
Subject: Conversation with Zuck, Penelope - AMS
Date: Tuesday, December 22, 2015 9:59:15 AM

Mann, Renee - AMS 9:46 AM:

FYI - ETKO's annual report is due January 22. They still need to submit this while they're in good standing with us.

Mary Lou sent them a notice on 12/16 about the annual report, but if you're going to send them an email with answers, could you please remind them that it is due.

Zuck, Penelope - AMS 9:47 AM:

Ok, I'll remind them again.

Mann, Renee - AMS 9:47 AM:

Thanks.

Zuck, Penelope - AMS From:

Courtney, Cheri - AMS; Mann, Renee - AMS To:

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: Swartwood, Stacy - AMS

To: <u>cb@etko.com.tr</u>

 Cc:
 ma@etko.com.tr; Claypool, Rebecca E - AMS

 Subject:
 FW: Client Registration into USDA Database

 Date:
 Thursday, December 22, 2016 8:22:29 AM

Attachments: <u>image001.jpg</u>

Good day, Ceren!

Our recommendation for resolving the duplicate operation entries based on data management best practices is to update the original operation record (NOP Operation ID 9963092013) with the new Client ID (3220D-02) and other details such as the additional items listed for the new operation record (NOP Operation ID 9963220002). Once that has been completed, I can assist with managing the duplicate new operation record.

This recommendation is based on findings in the database as follows:

- Grainagro Surrendered 8/8/2016
- Ukrfield Certified 11/1/2016
- We could not locate any operations named "Dnepryanske" but did find Dnipryanske HPP (3220D-02) Certified 11/17/2016 (NOP Operation ID 9963220002)
- We could not locate any operations with Client ID 3092D-13, but did find another operation named Dnipryanske HPP Certified 12/3/15 (NOP Operation ID 9963092013)

Т	hanl	k١	/0	u!
	HUIL	· '	y	u.

Stacy

Stacy Swartwood Program/Systems Analyst USDA/AMS National Organic Program South Building Room 2649, Ag Stop 0268 202/260-9443

stacy.swartwood@ams.usda.gov

From: AMS - AlAinbox

Sent: Wednesday, December 21, 2016 12:31 PM

To: Swartwood, Stacy - AMS < stacy.swartwood@ams.usda.gov>

Subject: FW: Client Registration into USDA Database

From: Ceren BAYAZIT [mailto:cb@etko.com.tr]
Sent: Tuesday, December 20, 2016 6:08 AM
To: AMS - AlAinbox@ams.usda.gov>

Cc: ma@etko.com.tr

Subject: FW: Client Registration into USDA Database

Dear Ms. Rebecca,

We have a question about the registration into USDA Database. Last year, we certified an operator, formed of 2 traders (3092D-01 GRAINAGRO, 3092D-13 DNEPRYANSKE) and 4 farmers which have been already registered into the Database. This year, however, the trader GRAINAGRO has quit and in place of them, an another company has become the trader (3220D-01 UKRFIELD) of these 4 farms and DNEPRYANSKE. Somehow, I'd changed the client no.of DNEPRYANSKE as 3220D-02 and registered into the database. Thus, I want to delete the former one 3092D-13 but, I came to know that it's not allowed. Is there any way to be able to change the client no. in the database? I'd be grateful if you could provide any suggestion.

As for farmers, we consider to keep using the former client numbers as 3092F.

Thank you in advance.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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From: <u>Tharp, Melissa - AMS</u>

To: <u>Atkins, Patricia - AMS; Mann, Renee - AMS</u>
Subject: FW: Imports of organic soybeans

Date: Tuesday, September 27, 2016 2:44:45 PM

Importance: High

Mr. de Lapérouse is asking if he can get a response today on his questions below. Can one of you assist him?

From: Tharp, Melissa - AMS

Sent: Monday, September 26, 2016 2:35 PM

To: Tucker, Jennifer - AMS

Subject: FW: Imports of organic soybeans

I took a call from the gentleman below who had some questions regarding organic soybeans.

From: Philippe de Lapérouse [mailto:pdelaperouse@highquestpartners.com]

Sent: Monday, September 26, 2016 12:48 PM

To: Tharp, Melissa - AMS

Subject: Imports of organic soybeans

Dear Melissa,

Following my call to you a few minutes ago, here are the questions I have.

- What certifiers are accredited for soybean and or soybean meal imports from Romania and India?
- What tests are being conducted to verify organic shipments at arrival in the U.S. and at what is the acceptable tolerance level?
- What is the status of ETKO's [Ecological Farming Control Organization Turkey] accreditation by the USDA given the fact that Canada suspended ETKO's accreditation on July 31, 2016?

Many thanks in advance for your response to these questions.

Philippe de Lapérouse

Managing Director

HighQuest Group 1005 North Warson Road, Suite 218

1000 North Warson Road, Saite 2

St. Louis, Missouri 63132

pdelaperouse@highquestpartners.com

1-314-994-3282(o)

(b) (6)

1-314-812-8080(f)

www.highquestpartners.com www.globalaginvesting.com From: <u>Tucker, Jennifer - AMS</u>
To: <u>Mann, Renee - AMS</u>

Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting

Date: Tuesday, November 08, 2016 8:16:06 AM

Just wanted you to be aware.

Jenny

From: McEvoy, Miles - AMS

Sent: Tuesday, November 08, 2016 5:04 AM

To: Courtney, Cheri - AMS

Cc: Tucker, Jennifer - AMS; Lewis, Paul I - AMS; Gebault King, ReneeA - AMS **Subject:** FW: thank you for joining us on November 15 at the Pre-NOSB meeting

Please prepare talking points for these questions as they are under AIA responsibilities. Thanks.

From: Abby Youngblood [mailto:abby@nationalorganiccoalition.org]

Sent: Monday, November 07, 2016 4:52 PM

To: McEvoy, Miles - AMS < <u>Miles.McEvoy@ams.usda.gov</u>>

Cc: (b) (6)

Subject: thank you for joining us on November 15 at the Pre-NOSB meeting

Dear Miles,

Thank you for joining us at our Pre-NOSB meeting next week on Tuesday the 15th. I am writing to confirm that we have you scheduled to take part from 2:30 to 3:30. Are there others from USDA who will be able to join us?

We are planning on a Q&A format, similar to the format we've had during the past several meetings. Two of the topics we would like to discuss are outlined at the end of this message. I will be in touch very shortly with one or two additional topics. During the meeting, we would like to present each of these topics to you, hear your response and have time for some discussion. Here is the general format we have in mind:

- 5 min for opening remarks from you
- 3 min or less for NOC member to present topic/question
- 4 to 5 min for your response
- 10 min for discussion

If we spend about 15 to 20 minutes on each question, we should be able to finish in the time allotted. We have approximately 50 people planning to attend, including about 20 NOC members, as well as 30 others, including farmers, NOSB members, certifiers, animal welfare groups, and organic industry members.

We appreciate your dedication to organic and your engagement with NOC and others during the meeting. Please do not hesitate to let me know if you have questions.

Best Regards, Abby and Steve

1. QUESTION ON ORGANIC SEED

While the allowance for the use of non-organic seed in organic production is important for growers who lack access to appropriate organic seed, the organic seed requirement is inconsistently enforced. Many would like to see the NOP do more through guidance and regular trainings to create incentives for farms to use more organic seed and to establish a framework for continuous improvement in the use of organic seed.

How can this guidance be strengthened and what else can the NOP do to support increased use of organic seed? How will the NOP support tracking organic seed availability

by crop type and region on an annual basis?

2. QUESTION ON ORGANIC IMPORTS

Over the past few years, there has been a dramatic increase in imports of organic commodities, especially grains. A key area of concern for U.S. organic grain growers is whether these increased imports present an opportunity for fraudulently labeled organic products to enter the United States, undermining the opportunity for U.S. producers to get a fair price in the market. Long international supply chains may increase the opportunities for fraud due to breaks in the chain of recordkeeping, organic certification and verification that the USDA organic seal is built upon. The rise of imports from Turkey especially raises concern and one Turkish organic certifier, ETKO, has been decertified by the EU.

The NOP took the step of reminding importers of handling regulations on July 13, 2016, but this action is not enough to address the potential for fraud.

What plans does the NOP have to address this issue? Will the NOP require importers to be certified by an NOP accredited certifier going forward? What other systems will the NOP put in place to ensure the integrity of shipments of grains and other commodities?

--

Abby Youngblood
Executive Director
National Organic Coalition
Abby@NationalOrganicCoalition.org

Cell: (b) (6)

www.NationalOrganicCoalition.org

Twitter: @NationalOrganic

Facebook: Facebook.com/NationalOrganicCoalition

From: Swartwood, Stacy - AMS

To: Mann, Renee - AMS; Claypool, Rebecca E - AMS; Courtney, Cheri - AMS

Subject: RE: Client Registration into USDA Database

Date: Wednesday, December 21, 2016 1:26:19 PM

Attachments: <u>image001.jpg</u>

Hi Renee,

I can respond to this, (b) (5)				
(b) (5)				
Please let me know if that works for AIA.				
				
Crainagra Surrandarad 9/9/2016				
Grainagro – Surrendered 8/8/2016 Jkrfield – Certified 11/1/2016				
Oki field = Certified 11/1/2010				
I can't find any operations named "Dnepryanske" but did find:				
Dnipryanske HPP (3220D-02) – Certified 11/17/2016 (NOP Operation ID 9963220002)				
1/4 find				
I can't find any operations with Client ID 3092D-13, but did find another operation named				
Dnipryanske HPP – Certified 12/3/15 (NOP Operation ID 9963092013)				
Dispryuriske fil i Certified 12, 3, 13 (NOT Operation 12 3303032013)				
Stacy				
Stacy Swartwood				
Program/Systems Analyst				
USDA/AMS National Organic Program				
South Building Room 2649, Ag Stop 0268				
202/260-9443				
stacy.swartwood@ams.usda.gov				

From: AMS - AlAinbox

Sent: Wednesday, December 21, 2016 12:31 PM

To: Swartwood, Stacy - AMS <stacy.swartwood@ams.usda.gov>

Cc: Claypool, Rebecca E - AMS <Rebecca.E.Claypool@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>

Subject: FW: Client Registration into USDA Database

Hi Stacy,

Is this something you can respond to?

Thanks, Renee

Renee Mann

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

From: Ceren BAYAZIT [mailto:cb@etko.com.tr]
Sent: Tuesday, December 20, 2016 6:08 AM
To: AMS - AlAinbox@ams.usda.gov>

Cc: ma@etko.com.tr

Subject: FW: Client Registration into USDA Database

Dear Ms. Rebecca,

We have a question about the registration into USDA Database. Last year, we certified an operator, formed of 2 traders (3092D-01 GRAINAGRO, 3092D-13 DNEPRYANSKE) and 4 farmers which have been already registered into the Database. This year, however, the trader GRAINAGRO has quit and in place of them, an another company has become the trader (3220D-01 UKRFIELD) of these 4 farms and DNEPRYANSKE. Somehow, I'd changed the client no.of DNEPRYANSKE as 3220D-02 and registered into the database. Thus, I want to delete the former one 3092D-13 but, I came to know that it's not allowed. Is there any way to be able to change the client no. in the database? I'd be grateful if you could provide any suggestion.

As for farmers, we consider to keep using the former client numbers as 3092F.

Thank you in advance.

Saygilarimizla/ Best Regards
Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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From: Ceren BAYAZIT
To: AMS - AIAinbox

Subject: RE: ETKO- Annual Lists Due by January 2
Date: Tuesday, January 03, 2017 8:55:35 AM

Attachments: <u>image001.jpg</u>

Dear Ms. Renee,

Thank you for your feedback.

Happy new year!

Best wishes,

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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From: AMS - AIAinbox [mailto:AIAinbox@ams.usda.gov]

Sent: Tuesday, January 3, 2017 3:13 PM

To: Ceren BAYAZIT

Cc: ma@etko.com.tr; fa@etko.com.tr; ug@etko.com.tr Subject: RE: ETKO- Annual Lists Due by January 2

Dear Ceren:

Thank you for notifying us that your list is updated. Happy New Year!

Kind Regards,

Renee

Renee Mann

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

From: Ceren BAYAZIT [mailto:cb@etko.com.tr]
Sent: Monday, January 02, 2017 11:22 AM
To: AMS - AlAinbox < AlAinbox@ams.usda.gov>

Cc: ma@etko.com.tr; fa@etko.com.tr; ug@etko.com.tr

Subject: ETKO- Annual Lists Due by January 2

Dear Sirs,

We as ETKO kindly inform you that our list in INTEGRITY is up-to-date and complete as provided also in the attachement.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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From: Reid, John - AMS [mailto:John.Reid@ams.usda.gov]

Sent: Wednesday, December 21, 2016 11:32 PM

To: Courtney, Cheri - AMS

Subject: REMINDER: Annual Lists Due by January 2

Importance: High

Dear USDA Accredited Certifiers:

This is a reminder that your lists of certified operations must be uploaded and successfully published in the INTEGRITY database by January 2, 2017. On December 13, 2016, we published an update to the Instruction for Submitting Annual Lists of Certified Operations (NOP 2026) to help you with this process: https://www.ams.usda.gov/sites/default/files/media/2026.pdf. If you have questions about submitting your list to INTEGRITY, you can find instructions on the INTEGRITY pages.

Also, please email the <u>AlAlnbox@ams.usda.gov</u> on or before January 2 to inform us that your list in INTEGRITY is up-to-date. If you plan to submit your list early (i.e. in late December) and do not have any changes to submit through the January 2 deadline, you may email us early and to let us

know that your list is accurate and will not change through January 2.

We will issue noncompliances to certifiers that fail to ensure their list of certified operations is updated as of January 2.

Thank you for submitting your lists on time. If you have any questions, please direct these to your Accreditation Manager or the <u>AlAlnbox@ams.usda.gov</u>.

Thank you,

Cheri Courtney
Director, Accreditation and International Activities Division
USDA National Organic Program

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From: Reid, John - AMS
To: Mann, Renee - AMS
Subject: RE: ETKO Settlement?

Date: Monday, October 24, 2016 9:50:41 AM

Attachments: <u>image001.jpg</u>

No problem. I will investigate further in appeals.

John

From: Mann, Renee - AMS

Sent: Monday, October 24, 2016 8:04 AM

To: Reid, John - AMS; Claypool, Rebecca E - AMS

Subject: RE: ETKO Settlement?

Hi John –

This is correct – they are in settlement. You can check the tracking sheet in appeals to double check,

but that is my understanding.

See - P:\Appeals

-RM

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

From: Reid, John - AMS

Sent: Wednesday, October 19, 2016 5:16 PM

To: Mann, Renee - AMS < Renee. Mann@ams.usda.gov >; Claypool, Rebecca E - AMS

<<u>Rebecca.E.Claypool@ams.usda.gov</u>>

Subject: ETKO Settlement?

Неу,

While updating the AMS Website for Accred Certificates and CA Reports (b) (5)

. Are they in a Settlement?

Just for awareness. Thanks

John A. Reid

Respectfully,

Program/Operations Analyst

USDA | National Organic Program

1400 Independence Avenue SW | 2649-S | Washington DC 20250

?

Main: (202) 260-9452 | Cell: (b) (6)

Stay connected with the NOP Organic Insider! Register here.

 From:
 Claypool, Rebecca E - AMS

 To:
 Mann, Renee - AMS

 Cc:
 Courtney, Cheri - AMS

Subject: RE: Imports of organic soybeans

Date: Tuesday, September 27, 2016 4:45:13 PM

Will do. Thanks

From: Mann, Renee - AMS

Sent: Tuesday, September 27, 2016 4:43 PM

To: Claypool, Rebecca E - AMS **Cc:** Courtney, Cheri - AMS

Subject: FW: Imports of organic soybeans

Hi Rebecca – please send the response you drafted. Copy Melissa, me and Cheri.

Thanks, Renee

Renee Mann

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

From: Courtney, Cheri - AMS

Sent: Tuesday, September 27, 2016 4:40 PM

To: Mann, Renee - AMS < <u>Renee.Mann@ams.usda.gov</u>>

Subject: RE: Imports of organic soybeans This is good to go – I ran it by Miles.

Cheri

From: Mann, Renee - AMS

Sent: Tuesday, September 27, 2016 4:22 PM

To: Claypool, Rebecca E - AMS < Rebecca. E. Claypool@ams.usda.gov>; Courtney, Cheri - AMS

<<u>Cheri.Courtney@ams.usda.gov</u>>

Subject: RE: Imports of organic soybeans

Rebecca,

Thanks for your quick work on this. This is excellent. I think Cheri is going to forward it to Miles now.

-Renee

Renee Mann

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

From: Claypool, Rebecca E - AMS

Sent: Tuesday, September 27, 2016 4:20 PM

To: Mann, Renee - AMS < <u>Renee.Mann@ams.usda.gov</u>>; Courtney, Cheri - AMS

<<u>Cheri.Courtney@ams.usda.gov</u>>

Subject: Imports of organic soybeans

Renee and Cheri,

Here is my draft response to Mr. de Lapérouse. Please edit or make suggestions as needed.

Thanks!! Rebecca Dear Mr. de Lapérouse,

Thank you for your questions, and I hope my answers below are helpful.



Please let me know if I can be of further assistance.

Kind regards,

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: <u>Claypool, Rebecca E - AMS</u>

To: <u>Mann, Renee - AMS</u>; <u>Courtney, Cheri - AMS</u>

Subject: RE: Imports of organic soybeans

Date: Tuesday, September 27, 2016 4:25:11 PM

Happy to help. ☺

From: Mann, Renee - AMS

Sent: Tuesday, September 27, 2016 4:22 PM

To: Claypool, Rebecca E - AMS; Courtney, Cheri - AMS

Subject: RE: Imports of organic soybeans

Rebecca,

Thanks for your quick work on this. This is excellent. I think Cheri is going to forward it to Miles now.

-Renee

Renee Mann

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

From: Claypool, Rebecca E - AMS

Sent: Tuesday, September 27, 2016 4:20 PM

To: Mann, Renee - AMS < Renee. Mann@ams.usda.gov >; Courtney, Cheri - AMS

<<u>Cheri.Courtney@ams.usda.gov</u>>

Subject: Imports of organic soybeans

Renee and Cheri,

Here is my draft response to Mr. de Lapérouse. Please edit or make suggestions as needed.

Thanks!! Rebecca

Dear Mr. de Lapérouse,



Please let me know if I can be of further assistance.

Kind regards,

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: <u>Wilburn, Tammie - AMS</u>
To: <u>Mann, Renee - AMS</u>

Subject: RE: List of Certifiers contacted for Turkish Imports

Date: Tuesday, November 29, 2016 1:05:35 PM

Call before 3 please

From: Mann, Renee - AMS

Sent: Tuesday, November 29, 2016 12:57 PM

To: Wilburn, Tammie - AMS

Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

Do you know if the list of certifiers below would be any smaller if we only searched for certifiers who certify handlers (not producers) of corn? Miles wants us to limit our letter to handlers.

Also, I have some questions for you about the list of countries you searched in... do you have some time early this afternoon to chat?

Thanks,

Renee

Renee Mann

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

From: Wilburn, Tammie - AMS

Sent: Tuesday, November 22, 2016 3:16 PM

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

Cc: Mann, Renee - AMS < <u>Renee.Mann@ams.usda.gov</u>>; Holmes, Vella - AMS

<<u>Vella.Holmes@ams.usda.gov</u>>

Subject: List of Certifiers contacted for Turkish Imports

Hi Cheri,

Following is the list of certifiers I've requested information from. I have not heard back from ACO, Etko and BioAgricert. It would be great if AIA would send these three certifiers a reminder to respond to my request as soon as possible.

- 1. BioInspecta
- 2. BCS
- 3. Control Union
- 4. EcoCert
- 5. LACON

- 6. IBD nothing to report from Eastern Europe or Turkey.
- 7. ACO
- 8. ETKO
- 9. BioAgricert

Per the data we received from Andrew from ACE, the following U.S. Based certifiers are involved so far. I will more than likely add to this list as I go through and receive more information from certifiers.

- 1. ProCert
- 2. QAI
- 3. CCOF
- 4. PCO
- 5. CERES

Tammie Wilburn
Compliance and Enforcement Division
National Organic Program
1400 Independence Avenue, S.W.
Room 2646 (Stop 0268)
Washington, D.C. 20250
(202) 690-2624 (direct line)

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From: <u>Wilburn, Tammie - AMS</u>

To: Mann, Renee - AMS; Courtney, Cheri - AMS

Cc: Holmes, Vella - AMS

Subject: RE: List of Certifiers contacted for Turkish Imports

Date: Tuesday, November 29, 2016 3:41:12 PM

Ok thanks.

From: Mann, Renee - AMS

Sent: Tuesday, November 29, 2016 3:36 PM **To**: Wilburn, Tammie - AMS; Courtney, Cheri - AMS

Cc: Holmes, Vella - AMS

Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

To follow-up on our conversation today, here are the certifiers that I found listing handler clients who handle corn, maize, zea maize, or zea mays in one of the 11 countries listed in the AIA letter:

- 1. BioInspecta
- 2. Kiwa-BCS (Note their name has changed to "Kiwa-BCS")
- 3. Control Union
- 4. EcoCert
- 5. ETKO
- 6. IMO Swiss AG (this one wasn't on your list below)

Renee Mann

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

From: Wilburn, Tammie - AMS

Sent: Tuesday, November 22, 2016 3:16 PM

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

Cc: Mann, Renee - AMS < Renee. Mann@ams.usda.gov >; Holmes, Vella - AMS

<<u>Vella.Holmes@ams.usda.gov</u>>

Subject: List of Certifiers contacted for Turkish Imports

Hi Cheri,

Following is the list of certifiers I've requested information from. I have not heard back from ACO, Etko and BioAgricert. It would be great if AIA would send these three certifiers a reminder to respond to my request as soon as possible.

- 1. BioInspecta
- 2. BCS
- 3. Control Union
- 4. EcoCert

- 5. LACON
- 6. IBD nothing to report from Eastern Europe or Turkey.
- 7. ACO
- 8. ETKO
- 9. BioAgricert

Per the data we received from Andrew from ACE, the following U.S. Based certifiers are involved so far. I will more than likely add to this list as I go through and receive more information from certifiers.

- 1. ProCert
- 2. QAI
- 3. CCOF
- 4. PCO
- 5. CERES

Tammie Wilburn
Compliance and Enforcement Division
National Organic Program
1400 Independence Avenue, S.W.
Room 2646 (Stop 0268)
Washington, D.C. 20250
(202) 690-2624 (direct line)

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

Register for the NOP Organic Insider, the National Organic Program's email notification service, by visiting http://bit.ly/NOPOrganicInsiderRegistration.

From: <u>Wilburn, Tammie - AMS</u>
To: <u>Mann, Renee - AMS</u>

Subject: RE: List of Certifiers contacted for Turkish Imports

Date: Tuesday, November 29, 2016 1:05:15 PM

I think the list would be smaller if we ran handlers only. I will rerun my search and let you know what I find.

From: Mann, Renee - AMS

Sent: Tuesday, November 29, 2016 12:57 PM

To: Wilburn, Tammie - AMS

Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

Do you know if the list of certifiers below would be any smaller if we only searched for certifiers who certify handlers (not producers) of corn? Miles wants us to limit our letter to handlers.

Also, I have some questions for you about the list of countries you searched in... do you have some time early this afternoon to chat?

Thanks, Renee

Renee Mann

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

From: Wilburn, Tammie - AMS

Sent: Tuesday, November 22, 2016 3:16 PM

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

Cc: Mann, Renee - AMS < <u>Renee.Mann@ams.usda.gov</u>>; Holmes, Vella - AMS

<<u>Vella.Holmes@ams.usda.gov</u>>

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From: Courtney, Cheri - AMS
To: Wilburn, Tammie - AMS

Cc: <u>Mann, Renee - AMS</u>; <u>Holmes, Vella - AMS</u>

Subject: RE: List of Certifiers contacted for Turkish Imports

Date: Wednesday, November 23, 2016 9:14:52 AM

That is great news Tammy!

Cheri

From: Wilburn, Tammie - AMS

Sent: Tuesday, November 22, 2016 3:36 PM

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

Cc: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS

<Vella.Holmes@ams.usda.gov>

Subject: RE: List of Certifiers contacted for Turkish Imports

Oh just a heads up, (b) (5) (b) (5)

Tammie

From: Wilburn, Tammie - AMS

Sent: Tuesday, November 22, 2016 3:16 PM

To: Courtney, Cheri - AMS

Cc: Mann, Renee - AMS; Holmes, Vella - AMS

Subject: List of Certifiers contacted for Turkish Imports

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From: Wilburn, Tammie - AMS

Mann, Renee - AMS; Michael, Matthew - AMS; Holmes, Vella - AMS To:

Courtney, Cheri - AMS Cc:

Subject: RE: thank you for joining us on November 15 at the Pre-NOSB meeting

Date: Monday, November 14, 2016 11:50:26 AM

Hi Renee-

(b) (5)

And, it's at such an early stage that there's not

much to report.

Thanks,

TW

From: Mann, Renee - AMS

Sent: Monday, November 14, 2016 11:28 AM

To: Michael, Matthew - AMS; Holmes, Vella - AMS; Wilburn, Tammie - AMS

Cc: Courtney, Cheri - AMS

Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting

Hi Tammie:

I am preparing talking points for Miles (under deadline today) in preparation for his discussion

with the National Organic Coalition.

NOC asked about how NOP is addressing the issue of imports from Turkey.

Thanks,

Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

From: Courtney, Cheri - AMS

Sent: Wednesday, November 09, 2016 3:54 PM

To: Mann, Renee - AMS < Renee. Mann@ams.usda.gov >

Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting

Renee, since you work on both of these issues, please formulate talking points by COB Monday.

Thanks Cheri

From: McEvoy, Miles - AMS

Sent: Tuesday, November 08, 2016 5:04 AM

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

Cc: Tucker, Jennifer - AMS < Jennifer. Tucker@ams.usda.gov >; Lewis, Paul I - AMS

< Paull.Lewis@ams.usda.gov>; Gebault King, ReneeA - AMS < ReneeA.GebaultKing@ams.usda.gov>

Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting

Please prepare talking points for these questions as they are under AIA responsibilities. Thanks.

From: Abby Youngblood [mailto:abby@nationalorganiccoalition.org]

Sent: Monday, November 07, 2016 4:52 PM

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

Subject: thank you for joining us on November 15 at the Pre-NOSB meeting

Dear Miles.

Thank you for joining us at our Pre-NOSB meeting next week on Tuesday the 15th. I am writing to

confirm that we have you scheduled to take part from 2:30 to 3:30. Are there others from USDA who will be able to join us?

We are planning on a Q&A format, similar to the format we've had during the past several meetings. Two of the topics we would like to discuss are outlined at the end of this message. I will be in touch very shortly with one or two additional topics. During the meeting, we would like to present each of these topics to you, hear your response and have time for some discussion. Here is the general format we have in mind:

- 5 min for opening remarks from you
- 3 min or less for NOC member to present topic/question
- 4 to 5 min for your response
- 10 min for discussion

If we spend about 15 to 20 minutes on each question, we should be able to finish in the time allotted. We have approximately 50 people planning to attend, including about 20 NOC members, as well as 30 others, including farmers, NOSB members, certifiers, animal welfare groups, and organic industry members.

We appreciate your dedication to organic and your engagement with NOC and others during the meeting. Please do not hesitate to let me know if you have questions.

Best Regards,

Abby and Steve

1. QUESTION ON ORGANIC SEED

While the allowance for the use of non-organic seed in organic production is important for growers who lack access to appropriate organic seed, the organic seed requirement is inconsistently enforced. Many would like to see the NOP do more through guidance and regular trainings to create incentives for farms to use more organic seed and to establish a framework for continuous improvement in the use of organic seed.

How can this guidance be strengthened and what else can the NOP do to support increased use of organic seed? How will the NOP support tracking organic seed availability by crop type and region on an annual basis?

2. QUESTION ON ORGANIC IMPORTS

Over the past few years, there has been a dramatic increase in imports of organic commodities, especially grains. A key area of concern for U.S. organic grain growers is whether these increased imports present an opportunity for fraudulently labeled organic products to enter the United States, undermining the opportunity for U.S. producers to get a fair price in the market. Long international supply chains may increase the opportunities for fraud due to breaks in the chain of recordkeeping, organic certification and verification that the USDA organic seal is built upon. The rise of imports from Turkey especially raises concern and one Turkish organic certifier, ETKO, has been decertified by the EU.

The NOP took the step of reminding importers of handling regulations on July 13, 2016, but this action is not enough to address the potential for fraud.

What plans does the NOP have to address this issue? Will the NOP require importers to be certified by an NOP accredited certifier going forward? What other systems will the NOP put in place to ensure the integrity of shipments of grains and other commodities?

Abby Youngblood Executive Director National Organic Coalition

Abby@NationalOrganicCoalition.org

Cell: (b) (6)

www.NationalOrganicCoalition.org

Twitter: @NationalOrganic

Facebook: Facebook.com/NationalOrganicCoalition

From: Penelope.Zuck@ams.usda.gov on behalf of Zuck Penelope - AMS

To: ma@etko.org

Cc: AMS - AIAinbox; Mann Renee - AMS; Yang Roberth - AMS

Subject: Registered: Notice of Non-compliance - Onsite Assessment

Date: Wednesday, May 13, 2015 2:22:33 PM

Attachments: image001.png

NP4132LCA ETKO NoNC.pdf NP4132LCA ETKO NoNC Report pdf



This is a Registered Email® message from Zuck Penelope - AMS.

Dear Dr. Mustafa Akyuz,

Attached to this email is the NOP Notice of Noncompliance including the findings of the Ecological Farming Control Organization audit conducted on May 12-16, 2014. Corrective actions are due within 30 days of receipt of this notice. A copy of the assessment report, NP4132LCA, is attached for your reference.

If you have questions on this notice, please do not hesitate to contact your Accreditation Manager, Robert Yang, at 202-690-4540 or RobertH.Yang@ams.usda.gov.

Best regards,

Penny



Penny Zuck | USDA-National Organic Program | Accreditation Manager|

USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250

2 202.260.9444 | Fax 202.205.7808 | Penelope.Zuck@ams.usda.gov

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NOTICE OF NONCOMPLIANCE

MAY 1 3 2015

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

Dear Dr. Akyuz:

On May 12-16, 2014, a representative of the United States Department of Agriculture (USDA), National Organic Program (NOP), completed an onsite audit of the Ecological Farming Controlling Organization's (ETKO) organic certification program as part of its USDA Renewal Accreditation Assessment. On April 29, 2015 the NOP reviewed the results of the onsite audit to determine ETKO's compliance to the USDA organic regulations. A copy of the assessment report, NP4132LCA, is enclosed for your reference.

As the report indicates, 24 corrective actions for prior noncompliances (NP7199OOA.NC3, NC5, NC6; NP8050OOA.NC1, NC2; and NP9222ZZA.NC1-NC5, NC7-NC20) were cleared and determined to be implemented and effective. One noncompliance, NP9222ZZA.NC6, was withdrawn.

One noncompliance, NP9222ZZA.NC21, remains outstanding from your previous audit. Six new noncompliances (NP4132LCA.NC1 – NC6) were findings identified during the onsite audit and determined to be noncompliances. Please submit proposed corrective actions for all outstanding and new noncompliances to the <u>AIAInbox@ams.usda.gov</u> within 30 days from the date of this Notice indicating how the noncompliances will be corrected. The proposed corrective actions must also indicate how the ETKO management system will be modified to prevent future noncompliances.

Please refer to NOP 2608, Responding to Noncompliances, for further instructions on how to respond to noncompliances. Failure to promptly resolve outstanding noncompliances may result in proposed suspension or revocation of your USDA organic accreditation.

Page 2

If you have questions regarding this notice, please contact your Accreditation Manager, Robert Yang, at (202) 690-4540 or <u>RobertH.Yang@ams.usda.gov</u>.

Sincerely,

Cheri Courtney

Director, Accreditation and International Activities Division

National Organic Program

Enclosure

cc: AIA Inbox



NATIONAL ORGANIC PROGRAM: NONCOMPLIANCE REPORT

AUDIT AND REVIEW PROCESS

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

GENERAL INFORMATION

ETKO – Ecological Farming Control Organization		
160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey		
160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey		
Dr. Mustafa Akyuz		
General and QMS Manager		
ma@etko.org		
+90-232-3397606		
Reviewer & Auditor Penny Zuck, NOP Reviewer; Lars Crail, On-site Auditor.		
USDA National Organic Program (NOP)		
NOP assessment review: April 29, 2015		
Onsite audit: May 12-16, 2014		
NP4132LCA		
Yes		
Renewal Assessment		
To evaluate the conformance to the audit criteria; and to verify the		
implementation and effectiveness of ETKO's certification program.		
7 CFR Part 205, National Organic Program as amended		
ETKO's certification services in carrying out the audit criteria for		
Crops, Wild Crops, and Handling.		

Organizational Structure:

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

ETKO was initially accredited as a certifying agent on January 22, 2003 to the USDA National Organic Program (NOP) for crops, wild crops, and handling. ETKO currently certifies operations

to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine. As of May 2014, ETKO's NOP client list had 40 certified operations with 22 crops, 3 wild crops, and 39 handling operations. ETKO certifies to the Turkish Organic Standard under the legal authority of the Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and Coordination Council (TURKAK). ETKO is also accredited by TURKAK to perform conformity assessments for Turkey's Good Agricultural Practices (GAP). ETKO is accredited to ISO 17065 by the International Organic Accreditation Service (IOAS) in the areas of agricultural production, processing and imports of organic agricultural products according to the EEC, GlobalGap, and the Global Organic Textile Standard (GOTS). ETKO is accredited to conduct Canadian Organic Regime (COR) certification.

ETKO employees 22 staff members that are involved in USDA organic certification. The staff consists of five administrative personnel and 17 technical personnel which also conduct inspections. No contract inspectors are used.

Certification Process:

Requests for certification are reviewed by the Managing Director (MD) and an information packet is provided by e-mail or a hard copy with information on the certification process, fee structure, USDA organic regulations, and a standard application document. The initial compliance review for new applicants is always conducted by a reviewer. Once the applicant appears to comply, an inspector is assigned based on region, experience, and availability. When the inspection is completed, a reviewer then evaluates the inspection results and a certification decision is made by the Organic Certifier position.

The continuing certification procedure is similar to that of initial applicants. For continuing certified operations, an annual production or handling update is received by ETKO on or before the anniversary date of the operation. A review is conducted by a reviewer or the assigned inspector. Inspectors are then assigned according to region, experience, and availability. Certification decisions are made by the Organic Certifier position.

The Turkish National Organic Standard does not permit grower group certification; therefore, all production and handling units must receive external inspections. However, there are four operations identified as grower groups in Turkey (mainly fruits, eg. figs, raisins, etc...) and four in foreign countries. ETKO has established certification procedures for grower groups.

Administrative Records and Processes:

ETKO has an extensive and well-designed, functioning quality system. Procedures and forms are established that cover most certification activities. The quality system documents are in English. Training is conducted annually for all certification staff and appears to be comprehensive and well documented. Key certification staff receive annual external certification training.

Summary of Witness Inspections Conducted:

Three witness audits were conducted during the course of the onsite renewal assessment. All operation locations were within four hours of Izmir, Turkey, ETKO's main office. All inspections were annual inspections and announced. ETKO was planning to conduct additional

inspections when harvest or processing is occurring. One operation was certified organic wild crop and gathering capers. The other two witness operations were certified for crop and handling/processing scopes. The crop operation was identified as a community of fig producers and the processor operation handled a number of fruit products to include the figs from the grower group.

NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether ETKO's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the onsite audit to determine whether noncompliances should be issued to ETKO.

Noncompliances from Prior Assessments

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

NP7199OOA.NC3 – **Cleared.** 7 CFR §205.501 (a)(1) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part." *Qualifications for the Certification Committee were not submitted for review*.

Corrective Action: Qualifications for the Certification Committee were submitted. The submitted material verified that personnel serving on the Certification Committee have adequate qualifications.

2009 Verification of Corrective Action: Personnel records reviewed during the on-site audit verified personnel had sufficient qualifications as they pertained to experience and education in organic agricultural production and handling methods. However, interviews conducted, records reviewed, and witness inspection findings verified that the training provided to personnel did not include sufficient information on the NOP standards for ETKO to fully comply with and implement the organic certification program in accordance with the NOP Final Rule.

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

2014 Verification of Corrective Action: The new organizational structure of ETKO does not include a Certification Committee. Certification decisions are now determined by the "Organic Certifier." This position is held by one person. Annual certification training is required by all ETKO certification staff according to their Quality System procedures. ETKO provided evidence (Training summary, lesson plans, presentation materials, and training roster) of training conducted during 2013 through May 2014 for the NOP auditor's review.

The training plan for the remainder of 2014 was also provided and determined to be adequate.

NP7199OOA.NC5 – **Cleared.** 7 CFR §205.501 (a)(11)(v) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report." *Conflict of interest disclosure reports were not submitted for the Certification Committee.*

Corrective Action: Signed Conflict of Interest Disclosure Reports for 2006 and 2007 were submitted for the Certification Committee.

2009 Verification of Corrective Action: The Agreement for Confidentiality and Conflict of Interest Disclosure Reports were reviewed for all eight Certification Committee members. On two of the eight reports, the committee members had signed the document but did not provide any responses to the questions on the form. Additionally, there was no Agreement for Confidentiality and Conflict of Interest Disclosure Report for one of the two responsibly connected parties of ETKO.

2010 Corrective Action: ETKO submitted completed Agreement for Confidentiality and Conflict of Interest Disclosure Reports for all Certification Committee members and responsibly connected parties.

2014 Verification of Corrective Action: The Agreement for Confidentiality and Conflict of Interest Disclosure reports are signed annually. All reports were signed on January 2, 2014. The NOP auditor reviewed the personnel files of a reviewer, the decision maker, and an inspector. All reports were complete and no issues were noted.

NP7199OOA.NC6 – **Cleared**. 7 CFR §205.662 (b) states, "When a certified operation demonstrates that each noncompliance has been resolved, the certifying agent or the State organic program's governing State official, as applicable, shall send the certified operation a written notification of noncompliance resolution." *Non-compliance resolutions were not addressed in the policies or procedures submitted.*

Corrective Action: ETKO has submitted a template of the non-compliance resolution.

2009 Verification of Corrective Action: ETKO has the template letter of non-compliance as part of their quality management documentation; however, they have not implemented its use and the inspector, not ETKO, is documenting corrective actions and resolution of non-compliances using ETKO's Non-Conformity Report.

2010 Corrective Action: ETKO revised GP 18, section 5.24 to address the handling of non-compliances. ETKO has implemented the use of the non-compliance letter and submitted example of non-compliance letters.

2014 Verification of Corrective Action: Procedures for issuing a Notice of Noncompliance Resolution is listed in GP 18, section 5.25.1. The Notice of Noncompliance Resolution template was revised in 2012 and is compliant. The NOP auditor reviewed records of four noncompliance notifications that were issued. The corrective actions were accepted and ETKO issued a Notice of Resolution to the operations.

NP8050OOA.NC1 - Cleared. 7 CFR §205.201 (a) states, "The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations." The organic system plans for the files submitted do not contain all of the information required in this section. The plans are designed with questions requiring a yes or no answer which does not give any detail as to how the applicant's operation complies with the NOP Final Rule.

Corrective Action: Operators were requested to update the Organic System Plans. Organic System Plans for all NOP certified operations were submitted. They now contain information necessary to determine compliance to the NOP Final Rule.

2009 Verification of Corrective Action: In three of four files reviewed there were deficiencies identified with the organic system plans (OSP). Two of the files were the same certified operations for which the original non-compliance was identified and were also the selected witness inspections. The on-site review of files, interviews, and observations during the witness inspections verified the OSPs were not in compliance.

- 1. The wild crop Organic System Plan (OSP) did not adequately address requirements for recordkeeping, designated harvest areas and buffers zone.
- 2. The OSP for the producer witness inspection did not adequately address requirements for the description of recordkeeping, buffer zone requirements, soil fertility and crop nutrient management, and input use.
- 3. The OSP for the processor witness inspection had insufficient information to address the requirements for the monitoring and frequencies to be performed and maintained to verify the plan is implemented. The OSP did not contain documented procedures of the measures for preventing the commingling of organic and nonorganic products. The processor was not maintaining production, cleaning, or shipment records. The OSP did not identify the use of "organic" vegetable oil in the equipment used for processing the organic raisins.
- 4. The OSP for the processor/producer did not identify the use of lime sulfur for pest prevention at the raisin storage depot prior to shipment to the processor.
- 5. Overall, OSP's did not meet the requirements for compliance to this clause.

2010 Corrective Action: ETKO issued a notification of non-compliances to the operations and ultimately suspended the operations. ETKO revised their OSP for wild crop, producers, and processors to emphasize the requirement to fully address all requirements. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which addressed the need for fully completed OSPs.

2014 Verification of Corrective Action: The revised Organic Compliance Plans (OCPs) for the wild crop and handler witness audits were in use. The NOP auditor reviewed the OCPs and determined that they were compliant.

NP8050OOA.NC2 – **Cleared.** 7 CFR §205.402 (a) states, "Upon acceptance of an application for certification, a certifying agent must: (2) Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part." *The organic system plans for the files submitted do not contain all of the information required in NOP §205.201. Due to the lack of the required information it would not be possible to make an accurate determination that the organic system plan complies with the requirements of this section.*

Corrective Action: Operators were requested to update the Organic System Plans. Organic System Plans for all NOP certified operations were submitted. They now contain information necessary to determine compliance to the NOP Final Rule.

2009 Verification of Corrective Action: The on-site review of files, interviews, and observations during the witness inspections verified that the OSPs had inadequate information to determine compliance to the NOP Final Rule and certified operations were not in compliance with the NOP Final Rule (see NP8050OOA.NC1 above).

2010 Corrective Action: ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which addressed the need for fully completed OSPs. ETKO submitted a completed OSP review documenting that the ETKO reviewers were requiring adequate information.

2014 Verification of Corrective Action: OCPs reviewed by the auditor showed that there was sufficient detail and where there was not enough detail, the inspectors would ask the operations to provide the additional information by updating the OCP onsite or submitting it to the ETKO office.

NP9222ZZA.NC1 – Cleared. 7 CFR §205.405(a) states, "When the certifying agent has reason to believe, based on a review of the information specified in §205.402 or §205.404, that an applicant for certification is not able to comply or is not in compliance with the requirements of this part, the certifying agent must provide a written notification of noncompliance to the applicant." 7 CFR §205.406(c) states, "If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662." ETKO as a certifying agent is not making a determination of compliance or issuing a written notification of non-compliance based on a review of the on-site inspection findings. ETKO's inspectors are issuing non-compliances directly to the applicants or certified operations at the time of inspection using their Non-Conformity Report and also reviewing and approving the corrective actions for identified non-

compliances. ETKO's Certification Committee does not review or make a determination of non-compliances and all non-compliances identified by the inspector must be resolved prior to forwarding the file to the committee.

Corrective Action: ETKO revised General Procedure 18 (GP 18) in sections 5.7, 5.22, and 5.24 to require that the Certification Committee be responsible for providing notification of non-compliance and for the resolution of non-compliance. The revised procedures specifically state that inspectors are not issuing non-compliances directly to the applicants or certified operations.

2014 Verification of Corrective Action: Notifications of minor issues and non-compliances are issued by ETKO. The NOP auditor noted no issues with ETKO's process of issuing notifications.

NP9222ZZA.NC2 – **Cleared.** 7 CFR §205.406(a)(1-4) states, "To continue certification, a certified operation must annually...submit the following information, as applicable, to the certifying agent:..." 7 CFR §205.662(a) states, "*Notification*. When an inspection, review, or investigation of a certified operation by a certifying agent...reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation." *ETKO is not issuing a notification of noncompliance to certified operations that do not annually submit the information required in §205.406(a)(1-4).*

Corrective Action: ETKO revised GP 18 in sections 5.23 and 5.24 to require that a notification of non-compliance be sent to certified operations that do not submit the required annual update. **2014 Verification of Corrective Action:** All files reviewed by the NOP auditor indicated that operations were submitting their annual updates in a timely manner.

NP9222ZZA.NC3 – Cleared. 7 CFR §205.501(11)(vi) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Ensuring that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection." ETKO's head inspector or the individual inspectors are conducting the inspections and essentially making the certification decision based on the fact that no files are forwarded to the certification committee until all non-compliances identified by the inspector have been addressed by the clients and corrective actions reviewed and approved by the inspector or head inspector. No files with outstanding non-compliances are sent forward for review by the Certification Committee.

Corrective Action: ETKO revised General Procedure 18 (GP 18) in section 5.24 to require that the Certification Committee be responsible for making the certification decision, including review and resolution of non-compliances, and that the head inspector and inspectors not have any responsibility or authority for these activities.

2014 Verification of Corrective Action: All decisions are now made by the Organic Certifier and recorded on form: GP 13 F 01, Certification Proposal. No issues noted by the NOP auditor.

NP9222ZZA.NC4 – **Cleared.** 7 CFR §205.662(a-c) states, "When an inspection, review, or investigation of a certified operation by a certifying agent... reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation..." NOP §205.404(c) states, "Once certified, production or handling

operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program's governing State official, or the Administrator." *ETKO is not requiring clients to notify them when they want to surrender their certification and is issuing letters of surrender to the clients informing them their NOP certificate was surrendered because they did not re-apply for NOP Certification and they cannot use their NOP certificate and must return it. ETKO has "surrendered" the certification of four of their fifteen currently certified operations during years the clients chose not to re-apply for certification and then re-certified them in subsequent years when they reapplied. ETKO also "surrendered" the certification of sixteen additional clients that did not ever re-apply for certification and are no longer listed as certified operations.*

Corrective Action: ETKO revised GP 15 in section 5.4 to require clients to inform ETKO of their decision to surrender their certification and to return the original certificate. The revised procedure also requires ETKO to contact clients that have not submitted updates to determine if they want to surrender.

2014 Verification of Corrective Action: The NOP auditor reviewed two operation files where certification was surrendered and no issues were noted.

NP9222ZZA.NC5 – **Cleared.** 7 CFR §205.404(b)(2) states, "The certifying agent must issue a certificate of organic compliance to the certified operation which specifies the: effective date of certification. *The effective date of certification was not included on the certificates for 2 of 4 files reviewed.*

Corrective Action: ETKO revised their template certificates to include the effective date of certification. ETKO reviewed their files and issued revised certificates with the effective date of certification for five certified operations.

2014 Verification of Corrective Action: All certificates reviewed by the NOP auditor displayed an effective date.

NP9222ZZA.NC6 – **Withdrawn.** ETKO's general procedure GP 18, Section 5.2.2 Review of Application, specifies that the application review is conducted by a competent inspector assigned by ETKO. The Managing Director is conducting all of the initial application reviews and prior to 2009 was also conducting the annual update reviews; however, this responsibility is not identified in ETKO's procedures.

Corrective Action: ETKO revised GP 18, Section 5.2.2 Review of Application to specify that the application review is conducted by a competent person assigned by ETKO. The competent person may be the Managing Director or other review staff.

2014 Verification of Corrective Action: This noncompliance did not cite the USDA organic regulations and does not appear to be in violation of the regulations. Interviews of ETKO personnel and a review of the operation files indicate that certification reviews are conducted by someone other than the certification decision maker. Therefore, the NOP withdrew this noncompliance.

NP9222ZZA.NC7 – **Cleared.** 7 CFR §205.501(a)(16) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Charge applicants for certification and certified production and handling operations only those fees and charges for

certification activities that it has filed with the administrator." Fees charged and described on the Cost Estimate and Invoice as "Follow-up, Certification: NOP ETKO Staff" are not included on the submitted fee schedule (TI 14). On all three files reviewed for fees charged to clients all three clients were not charged in accordance with the fee schedule. All three clients were undercharged based on the number of inspectors and days taken for the certification which is the method utilized by ETKO to determine the certification fees to be charged.

Corrective Action: ETKO revised their fee schedule (TI 14) to match the fees charged and described in the Cost Estimate and Invoice.

2014 Verification of Corrective Action: Interviews with ETKO personnel and certified operators in addition to operation file review indicated that estimated fees are provided to applicants and continuing certified operations and calculated according to the fee schedule.

NP9222ZZA.NC8 – **Cleared.** 7 CFR §205.642 states, "Fees charged by a certifying agent must be reasonable...The certifying agent shall provide each applicant with an estimate of the total cost of certification and estimate of the annual cost of updating the certification...The certifying agent may set the nonrefundable portion of certification fees; however, the nonrefundable portion of certification fees must be explained in the fee schedule." *Nonrefundable fees are explained in the procedures but not in the fee schedule.*

Corrective Action: ETKO revised their fee schedule (TI 14) to explain nonrefundable fees. **2014 Verification of Corrective Action:** ETKO lists nonrefundable fees in the current fee schedule.

NP9222ZZA.NC9 – **Cleared.** 7 CFR §205.501(a)(7) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measure to correct any non-compliances with the Act and the regulations in this part that are identified in the evaluation." *ETKO's annual program review is not addressing all certification activities for the NOP. The 2008 internal audit used for the annual program review only reviewed EU files. The 2009 internal audit included NOP files; however, the 2009 annual program review had not been completed so it was not possible to verify the information to be reviewed.*

Corrective Action: ETKO revised TI 30 NOP Accreditation Requirements and SP 03 Management Review procedure to ensure the annual program review addresses all certification activities for the NOP.

2014 Verification of Corrective Action: Management review report was completed on December 28, 2013 and included in ETKO's annual report acknowledged by the NOP in March 2014.

NP9222ZZA.NC10 – **Cleared.** 7 CFR §205.207(a) states, "A wild crop that is intended to be sold, labeled, or represented as organic must be harvested from a designated area..." NOP §205.202 states, "Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as organic must: (c) Have distinct, defined boundaries and buffer zones..." The wild crop witness inspection operation did not have maps or description designating the harvest area or identifying the buffer zones.

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspend the operation. ETKO revised their wild collection procedure (TI 20) to more specifically require maps or a description of designated harvest areas and identification of buffer zones. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010.

2014 Verification of Corrective Action: During a witness audit of a wild crop inspection, the OCP maps of the three gathering areas indicated defined boundaries.

NP9222ZZA.NC11 – **Cleared.** 7 CFR §205.307(b) states, "Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the lot number of the product if applicable." The clients organic system plan (Section A16.3 Collection Activities) stated the main wild crop collector stores the product in a barrel labeled as organic. A barrel of capers at the wild crop collection depot did not have any labels or identification; although, the head collector stated it was organic.

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspend the operation. ETKO revised the GP 18 procedure and the GP 18 F01-02 forms to ensure adequate labels and identification of organic product during inspections. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures. **2014 Verification of Corrective Action:** All wholesale containers inspected and observed during the witness audits had lot numbers on labels.

NP9222ZZA.NC12 – **Cleared.** 7 CFR §205.103(b)(2)(4) states, "(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are... (b) Such records must: (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited; (4) Be sufficient to demonstrate compliance with the Act and the regulations in this part." *The operators for the wild crop, crop, and processing witness inspections did not maintain sufficient records to comply with the requirements.*

Corrective Action: ETKO issued a notification of non-compliance to the operations and ultimately suspended the operations. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures, including the necessity of maintaining sufficient records.

2014 Verification of Corrective Action: All the operations observed during witness audits had sufficient records for the inspections to be fully conducted.

NP9222ZZA.NC13 – **Cleared.** 7 CFR $\S 205.403(c)(1) - (3)$ states, "The on-site inspection of an operation must verify: (1) the operation's compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which..."

1. During the inspection of the wild crop operation, the inspector did not reference the organic system plan during the inspection, did not physically verify all buffer

- areas or inquire about potential areas of contamination, and did not identify a non-labeled barrel (containing organic product) as a non-compliance.
- 2. During the producer witness inspection, the inspector did not inspect the storage unit where raisins are stored prior to shipment to the processor because there was nothing currently in storage. The inspector did not inquire about the use of lime sulfur for pest prevention at the storage depot; although, the product had recently been used by the certified operation and a bag was available for review.
- 3. During the producer witness inspection, the inspector did not fully inspect the chemical storage area of the producer and did not inquire about the Valagro NPK 20.20.20 fertilizer, Cropex, and Sweet K-30 (water soluble potassium oxide) product in the storage area which were being used for conventional crops.

Corrective Action: ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures. ETKO increased monitoring activities of inspectors in 2009 and identified that during the 2010 inspection cycle all inspectors will be observed conducting NOP inspections to ensure compliance. ETKO submitted Inspector Monitoring Reports from the end of 2009.

2014 Verification of Corrective Action: ETKO continues to conduct annual training and field monitoring of inspectors. During the witness audits, inspectors were conducting thorough inspections with only minor issues observed and noted by the NOP auditor.

NP9222ZZA.NC14 – **Cleared.** 7 CFR §205.202(c) states, "Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as 'organic' must: (c) Have distinct, defined boundaries and buffer zones..." *The crop witness inspection locations did not have maps or written descriptions to identify the boundaries and the buffer zones*.

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspended the operations. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures. ETKO revised GP 18 to specify that NOP applicants and clients must submit maps with defined boundaries and buffer zones, as applicable.

2014 Verification of Corrective Action: During the witness inspections all OCPs were complete with land or facility maps.

NP9222ZZA.NC15 – **Cleared.** 7 CFR §205.203(a) states, "The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological conditions of soil..." *The OSP for the producer witness inspection stated they did practice cultivation methods to maintain or improve; however, five of the seven producers visited were leaving the fields unattended with little or no tillage or cultivation practices and only the application of inputs for pest or disease prevention and treatment.*

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspended the operations. ETKO revised GP 18 and GP 18 F 02 Agriculture Plan to address the issue of unattended fields. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action (May 2014): Witness audits of several crop operations

revealed that producers were actively farming the sites and improving soil health.

NP9222ZZA.NC16 – **Cleared.** 7 CFR §205.501(a)(8) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part." The wild crop, crop, and processor witness inspection clients and their subcontracted units did not have adequate knowledge of the NOP requirements to enable them to comply with the Act. The wild crop witness inspection client purchasing representative and person responsible for training the head collectors stated he had not seen the NOP Rule and did not have any knowledge of the NOP Rule.

Corrective Action: ETKO issued a notification of non-compliance to the operations and ultimately suspended the operations. ETKO revised GP 18 to emphasize the necessity of adequate knowledge of the NOP requirements. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action: ETKO is requiring certified operations to train and monitor individuals involved in organic production and handling activities. All operations observed and operation files reviewed indicated that training was occurring and recorded.

NP9222ZZA.NC17 – Cleared. 7 CFR §205.403 (a)(1) states, "A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each..." and ETKO Technical Instruction TI 20 Certification of Wild Collection, Rev Nr. 2, 20.10.2008, section 5.4 states "ETKO inspectors will visit a certain number of collecting sites, according to the risk factors of the collection system; minimum site visit must be 5 and according to inspector's decision: This number can be increased up to 10 collection sites." The ETKO instructions and procedures allow for a sampling of certified operations to be inspected as opposed to all certified sites being inspected annually and thereafter as required. These operations are not certified as grower groups and would not qualify as grower groups (don't have to sell all organic harvest through the group). The wild crop and producer witness inspections along with interviews conducted, and records reviewed verified that not all sites are inspected as required.

Corrective Action: ETKO revised TI 20 Certification of Wild Collection, section 5.4 to distinguish between group certification with an internal control system and individual collection operations without an internal control system. The individual collection operations have multiple collectors; however, they are not considered grower groups and according to the revised procedure the on-site inspection will include all collectors and all locations.

2014 Verification of Corrective Action: All certified and applicant locations require annual on-site inspections according to Turkish organic standards. During the witness audits, all fields were inspected by the inspectors. No issues noted by the NOP auditor.

NP9222ZZA.NC18 – **Cleared.** 7 CFR §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary" and

the 2002 NOSB Recommendation states, "The certifying agent shall have policies and procedures for determining how many growers must receive an annual inspection by the certifying agent." ETKO Procedure OP 02 Certification of Grower Groups is just a copy of the requirements for grower groups from the NOSB Recommendation. The procedure does not provide any actual information on how many growers will receive an annual inspection from the ETKO inspector.

Corrective Action: ETKO revised procedure OP 02 Certification of Grower Groups to define the risk categories of normal, medium, and high, and specify the number of members to be evaluated for each category. The total number for each category is based on increasing multiplication factors (1, 1.2, 1.4) of the square root of the total number of farmers with a mandatory minimum number of members that must be evaluated.

2014 Verification of Corrective Action: ETKO has a method (EU guidance) to calculate the number of external inspections of grower groups. All grower group files reviewed indicate that ETKO has properly implemented this procedure.

NP9222ZZA.NC19 – **Cleared.** 7 CFR §205.403(b)(2) states, "All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present..." *Five of seven farms inspected did not have the farmer that manages the operation present for the inspection. The company representative responsible for purchasing the product from the farmers was present and he is also a farmer of a certified operation; however, he was only aware of the general production practices and not the specific practices of each operation. An interview with one of the farmers was conducted off-site; however, he was not present during the review at his field.*

Corrective Action: ETKO revised GP 18, section 5.7 to specify that the NOP inspection cannot be carried out without the presence of an authorized and knowledgeable representative. ETKO informed NOP clients to provide NOP training to their responsible staff and producers. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action: All producers and operators were present during the witness audits. No issues noted by the NOP auditor.

NP9222ZZA.NC20 – **Cleared.** 7 CFR §205.301(a) states, "A raw or processed agricultural product sold, labeled, or represented as "100 percent organic" must contain (by weight or fluid volume, excluding water and salt) 100 percent organically produced ingredients." The crop and processing witness inspection client's organic certificate and organic system plan identifies the processed product (raisins) as 100 percent organic, but a potassium bicarbonate solution is being added to the grapes prior to on-farm drying to speed up the drying process and facilitate color development. One additional file reviewed identified the use of enzymes and non-certified pectin in a product identified as 100 percent organic.

Corrective Action: ETKO reviewed the files and revised the categories on the certificates to organic. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards and labeling requirements.

2014 Verification of Corrective Action: During the review of operation files and certificates, the NOP auditor did not note any issues of concern with ETKO's classification

of organic products.

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

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

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

- 1. Label review the label review checklist did not include USDA organic regulation label requirements to be verified.
- 2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
- 3. OCP templates state the incorrect USDA organic regulations.
- 4. Inspectors are using outdated USDA organic regulations (2010).
- 5. Inspectors and reviewers not readily able to look up regulations.
- 6. EKTO 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)).

Noncompliances Identified during the Current Assessment

NP4132LCA.NC1 – 7 CFR §205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670." Furthermore, NOP 4009, Instruction – Who Needs to be Certified?, states "The OFPA requires

that agricultural products sold or labeled as organically produced must be produced only on certified farms and handled only through certified handling operations (see 7 USC § 6506(a)(1)). The USDA organic regulations reiterate these requirements (see 7 CFR 205.100.)"

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

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

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

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

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

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

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

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

Minor updates or adjustments to the OCP during the onsite inspection is acceptable and can be noted in the inspector's report.

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

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

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

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

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

 From:
 Zuck, Penelope - AMS

 To:
 Mann, Renee - AMS

 Subject:
 WTL Status Report - 10/01/2015

 Date:
 Thursday, October 01, 2015 9:46:29 AM

Attachments: <u>image001.png</u>

Renee,

I did a search for items outstanding in the WTL over 90 days and here is a summary:

- 1. There are several Annual Reports outstanding (16)
- 2. Ecocert complaint in progress (PZ –reassigned from JH)
- 3. MAFF complaint re: TM-11 (RGK) last item in chrono log: 08/31 rec'd letter from PCO with responses to questions sent by NOP.
- 4. Reinstatement Request for Aaron Stoltzfus, Friendly Farms (PCO) last item in chrono log: 09/02 JL drafted letter to MM for review and cc'd CC, RM, RGK
- 5. Ecoglobe renewal in progress (RY)
- 6. TDA CA Report in progress (PZ)
- 7. ETKO CA Report in progress (PZ)
- 8. Livestock Grower Group Review project (RGK) not sure of status
- 9. Application for Accreditation IMO Latin America (RGK) not sure of status

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

Join the NOP mailing list

 From:
 Zuck, Penelope - AMS

 To:
 Mann, Renee - AMS

 Subject:
 WTL Status Report - 12/1/15

Date: Tuesday, December 01, 2015 1:47:08 PM

Attachments: <u>image001.png</u>

Renee,

The results of outstanding items in WTL over 90 days:

- 1. There are several Annual Reports outstanding (11)
- 2. Food Safety CA Report in progress (PZ)
- 3. OIA CA Report in progress (PZ)
- 4. Ecocert complaint in progress (PZ)
- 5. MAFF complaint re: TM-11 in progress (RGK)
- 6. Reinstatement Request for Aaron Stoltzfus, Friendly Farms (PCO) last item in chrono log: 09/02 JL drafted letter to MM for review and cc'd CC, RM, RGK Matthew is still working on this?
- 7. ETKO CA Report in progress (PZ)
- 8. Eco-LOGICA S.A. NC Report in progress (JL)
- 9. LETIS S.A. CA Report last entry in chrono $\log 8/26/15$ JH emailed RM for guidance on questions. Looks like it was re-assigned to JL in WTL 8/25/15.
- 10. IMO Latin America application for Accred notes: 9/11 RGK rec'd updated app and began desk audit.
- 11. ICEA satellite office CA Report in progress (JL)
- 12. OneCert CA Report in progress (PZ)

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

Join the NOP mailing list

From: <u>ma@etko.org</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notice Resolutions of Non-Compliances
Date: Monday, June 06, 2016 8:34:43 AM
Attachments: NRONC 3130F-01 AGROS.pdf

NRONC 3130F-01 AGROS.pdf NRONC 3130D-01 AGROS.pdf

Dear Roman

You can find attached Notification Resolution of Non-Compliances.

Best regards,

Mustafa Akyuz ETKO Turkey T:+90-232-3397606 F:+90-232-3397607 www.etko.org

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
Page	1/2

Dear Madam / Sir: Roman Vysochin Date: 06.06.2016

On the date **07.12.2015** ETKO Inspector **(b) (6)**, **(b) (7) (C)** realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **07.12.2015** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, 30.04.2016 and subsequently to close the outstanding noncompliances. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to **Mr. Mustafa Akyüz** from ETKO +90-232-3397606 or by email at: ma@etko.org, info@etko.org .

Sincerely

Dr. Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 1NC number(s): 15.1

Outstanding noncompliance : None
 NC number(s) :

Nr	GP 18 F 11
Date	15.07.2015
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Noncompliance	No	1	Major 🔀 Minör 🗌	Inspection Date	07.12.2015
Date of Notificat		02.04	.2016	Due Date	02.05.2016
Noncompliance §205.307 Labeling abeled as "100 perce a) Nonretail container may display the follow 1) The name and cont 2) Identification of the 3) Special handling ins 4) The USDA seal; 5) The seal, logo, or of produced or handled t b) Nonretail container display the production	of nonretail nt organic," " sused only to ing terms or n act informatic product as o structions nee ther identifyin he finished pr sused to ship lot number o s of domestica	organic, o ship or marks: on of the organic; ded to r organic organic organic ded to r organic froduct. o or stor ff the product	" or "made with org store raw or process e certifying agent when maintain the organic of the certifying age e raw or processed oduct if applicable, uced product labele	shipping or storage of ganic (specified ingredients seed agricultural product is integrity of the product; ent that certified the organization of the product labeled as organic intended for	raw or processed agricultural product or food group(s))." sbeled as containing organic ingredients which assembled the final product; ic production or handling operation that d as containing organic ingredients must export to international markets may be untry of destination or the container
abeling specifications such organic products must be maintained by \$205.101. A8.1: No labelling is storage are not indidate. 32.2: There is no income.	of a foreign co are clearly ma the handler i done for bu cated and h	ontract in accordance in accor	or Export Only" and dance with records asports. But they a labels, rages	: Provided further, That, p eeping requirements for ex	roof of such container marking and expo sempt and excluded operations under
abeling specifications such organic products must be maintained by §205.101.	of a foreign co are clearly ma the handler i done for bu cated and h	ontract on the contract of the	or Export Only" and dance with records asports. But they a labels, rages	: Provided further, That, p eeping requirements for ex	orages as ORGANIC and also crops
abeling specifications such organic products must be maintained by 5205.101. A8.1: No labelling is storage are not indi 32.2: There is no indi 32.5: No labels are in spection criteria Action taken: La sold as conventiorganic.	of a foreign co are clearly may the handler in done for bu- cated and hadication on to used for bull NOP reg. bels are pronal but s	alk tranave no the stock production ref	or Export Only" and dance with recorded asports. But they delabels, rages acts. 205.307a ed. Storages are of label is pro-	EProvided further, That, peeping requirements for extended not mark organic state of the ETKO rules ref. The indicated as organicated. Bulk produces the ETKO rules ref.	roof of such container marking and exported the such container marking and exported to such c
abeling specifications such organic products must be maintained by 5205.101. A8.1: No labelling is storage are not indi 32.2: There is no indi 32.5: No labels are in spection criteria Action taken: La sold as conventiorganic.	of a foreign co are clearly may the handler in the handler in done for but cated and hadication on to used for but NOP reg. bels are proposed but s	ontract orked "Fin accordance no the stock production or the stock production	or Export Only" and dance with recorded asports. But they delabels, rages acts. 205.307a ed. Storages are of label is pro-	EProvided further, That, peeping requirements for extended not mark organic state of the ETKO rules ref. The indicated as organicated. Bulk produces the ETKO rules ref.	834-Article 19, 23, IACB 7.4, 9.1 889-Article 35, IACB 7.5.4 OCP A8.1, B.2.2 and 2.5 anic (see pictures). Crops are acts will be indicated as es. In case organic trading.

Reviewer name & signature: Mustafa Akyüz

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Date	15.07.2015
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Dear Madam / Sir: Roman Vysochin Date: 06.06.2016

On the date **07.12.2015** ETKO Inspector **(b) (6)**, **(b) (7) (C)** realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **07.12.2015** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, 30.04.2016 and subsequently to close the outstanding noncompliances. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to **Mr. Mustafa Akyüz** from ETKO +90-232-3397606 or by email at: ma@etko.org, info@etko.org .

Sincerely

Dr. Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

• Closed noncompliance: 5

NC number(s): 15.1, 2, 3, 4, 5 See below

Outstanding noncompliance : None

NC number(s):

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Noncomplianc	e No	1	Major Minör	Inspection Date	07.12.2015
Date of Notific	ation	02.04	.2016	Due Dat	02.05.2016
(a) The handler of an nonorganic product (b) The following are accordance with sub (1) Packaging mater (2) The use or reuse organic integrity of a has been thoroughly used.	ingling and co n organic handli s and protect of e prohibited for opart D of this p ials, and storage of any bag or c any organically y cleaned and p	ing oper ganic pr use in thart: e container ontainer produce oses no	roducts from contact with prohib he handling of any organically pr ners, or bins that contain a synth that has been in contact with a d product or ingredient placed ir	necessary to pre- ited substances. oduced agricultur etic fungicide, pre- ny substance in su a those containers produced produc	vent the commingling of organic and ral product or ingredient labeled in
Inspection criteria	NOP reg	. ref	205.272 (a),	ETKO rules ref	889-Article 31 IACB 7.5.2 OCP 11.4, 15.1 and 2:
Action taken			torage and trucks clean		ented.
Name, Surnam Signature of A	e and		nan Vysochin	Date	30.04.2016
Review Date	02.06.	2016			Resolved Unresolved
	er form wa	is prej	pared for future trade a		Annex 4 and also Transport organic trade was realized

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Noncompliance	No	2	Major	Minör 🔀	Inspection Date	07.12.2015
Date of Notifica		02.04	1.2016		Due Date	02.05.2016
Noncompliance \$\frac{1}{2}205.307 Labeling products labeled as (a) Nonretail containg redients may dis (1) The name and coroduct; (2) Identification of (3) Special handling (4) The USDA seal; (5) The seal, logo, operation that prod (b) Nonretail contai	g of nonretai "100 percer ners used or play the follo ontact inforr the product instructions r other ident luced or han ners used to	at organily to so owing mation as org needed tifying dled the ship of	nic," "organic," hip or store raw terms or marks: of the certifying tanic; ed to maintain the mark of the cert ne finished prod or store raw or p	or "made with or or processed agg agent which ce the organic integratifying agent that uct. rocessed agricult the product if a	storage of raw or rganic (specified ricultural produ- rtified the hand ity of the produ- certified the of tural product la pplicable.	ganic production or handling beled as containing organic
c) Shipping contain markets may be lab destination or the c containers and ship Provided further, Th with recordkeeping	ers of dome eled in accor ontainer lab ping docume at, proof of requiremen	rdance eling s ents ac such co ts for o	with any shippi pecifications of ccompanying suc ontainer markin exempt and excl	ing container lab a foreign contrac ch organic produ g and export mu uded operations	eling requirement to buyer: Provid cts are clearly n st be maintaine under §205.10	ed, That, the shipping narked "For Export Only" and d by the handler in accordan
(c) Shipping contain markets may be lab destination or the c containers and ship Provided further,Th with recordkeeping There are no labe Inspection	ers of dome eled in accor ontainer lab ping docume at, proof of requiremen	rdance eling s ents ac such co ts for e	with any shippi pecifications of ccompanying suc ontainer markin exempt and excl	ing container lab a foreign contrac ch organic produ g and export mu uded operations	eling requirement to buyer: Provid cts are clearly n st be maintaine under §205.10	ents of the foreign country of ed, That, the shipping narked "For Export Only" and d by the handler in accordanc
markets may be lab destination or the c containers and ship Provided further,Th with recordkeeping There are no labe Inspection criteria	lers of dome eled in accord ontainer lab ping docume at, proof of requiremen els on the st NOP reg bels are pri ional but s supporting d	rdance eling s ents ac such co ts for e torage . ref	e with any shippi pecifications of ecompanying suc- container marking exempt and excl es and stored of 205.307 (a) ed. Storages le of label is	ing container lab a foreign contrac ch organic produ g and export mu luded operations crops are not n	eling requirement buyer: Provid cts are clearly not be maintained under §205.10 narked. ETKO rules ref. as organic (stage Pictures.	ents of the foreign country of ed, That, the shipping narked "For Export Only" and d by the handler in accordand 1.

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Noncompliance N	No 3	Major Min	ör Inspection	on 07.12.2015
Date of Notification		02.04.2016	Due Dat	02.05.2016
must: (a) Have been manage (b) Have had no prohit preceding harvest of t (c) Have distinct, defination application of a prohit is not under organic n	ed from whi ed in accord ibited substa the crop; an ned bounda bited substa nanagemen	dance with the provisions of §§ ances, as listed in §205.105, ap ad ries and buffer zones such as r ance to the crop or contact wit t	5205.203 through 20 oplied to it for a per runoff diversions to th a prohibited subsi	iod of 3 years immediately
are not clearly indi	cated.			
Inspection	NOP reg.	205.202 (c) ref	ETKO rules ref	6.5.3 - 834-Article 12.1,
Inspection criteria Action taken Ma	NOP reg.	ref	100000000000000000000000000000000000000	

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		Inspectio Date	n
02.04	1.2016	Due Date	02.05.2016
e or capabili ling the orga s the praction have not be de the collect	ty to comply with the Act and the anic production or handling system es used or to be used by the applie en and are not being applied to the tion and testing of soil; water; was	regulations in the plan, provided in cant for certification e operation throuste; seeds; plant t	accordance with §§205.401, 205.40 on or by the certified operation; igh means which, at the discretion of issue; and plant, animal, and
reg. ref	205.403c1	ETKO rules ref.	889-Article 31 IACB 7.5.2
ared.	ents, if any: Annexes		30.04.2016
		Date	50.5 1.2010
			Resolved Unresolved
	rmation. The e or capabili ding the orga is the practic have not be de the collect out training reg. ref llations wared.	rmation. The on-site inspection of an operation of or capability to comply with the Act and the ding the organic production or handling system is the practices used or to be used by the application and seen and are not being applied to the determined the collection and testing of soil; water; was cout trainings personal in organic farmations. 205.403c1 reg. ref ulations were downloaded from Usared. Ing documents, if any: Annexes Roman Vysochin p.	rmation. The on-site inspection of an operation must verify: e or capability to comply with the Act and the regulations in the ding the organic production or handling system plan, provided in est the practices used or to be used by the applicant for certificate have not been and are not being applied to the operation through the the collection and testing of soil; water; waste; seeds; plant to cout trainings personal in organic farming and NOP 205.403c1 ETKO reg. ref 205.403c1 ETKO rules ref. Illations were downloaded from USDA AMS we have ared. Ing documents, if any: Annexes Roman Vysochin Date 06.2016

Notification of Resolution of Nr GP 18 F 11 Date 15.07.2015 Noncompliance Rev 00 Page 6/6

Noncompliance		5	Major Mine	ör Inspec Date	tion	07.12.2015
age to be a second		02.04	.2016	2010		02.05.2016
Date of Notification			Due Da	ate	2000000	
(1) Nonorganically pro- organically produced v of edible sprouts; (2) Nonorganically pro- synthetic substances a organically produced of (3) Nonorganically pro- in accordance with \$20 (4) Nonorganically pro- organically produced of less than 1 year; and (5) Seeds, annual seed the application of the (b) [Reserved]	use organical duced, untread variety is not conduced seeds a allowed for user untreated valued annual 05.290(a)(2); duced plantinonly after the allings, and planterials is a	lly grow ated see commer and plane e in orga rariety is seedlin g stock planting anting store	n seeds, annual seedlings, ar ds and planting stock may be cially available: Except, That, atting stock that have been tr anic crop production may be so not commercially available; gs may be used to produce a to be used to produce a per- g stock has been maintained tock treated with prohibited ement of Federal or State pl	e used to produce a organically produce eated with a substa- used to produce an an organic crop whe ennial crop may be under a system of o	en organice in organice a te sold, la porganice e used tions.	enic crop when an equivalent ed must be used for the production cluded on the National List of nic crop when an equivalent mporary variance has been grante abeled, or represented as c management for a period of no
corn. Inspection			205.204	ЕТКО		834-Article 9, IACB 5.9,
criteria	NOP reg.	. ref		rules r	ef.	16.4
Please identify the s Name, Surname Signature of App	and		nts, if any: nan Vysochin	Date	30	0.04.2016
Signature of App	02.06.2	2016			R	esolved 🛛
Review Date	02.00.2	-010				nresolved
Review Commer			declaration for corn ustafa Akyüz	was provided	to E	тко.

Ref Nr: 20160729 Date: July 29, 2016

Subject: Minor Issues

Süleyman bey

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

As explained below necessary procedures and/or information must be prepared before the certification decision is taken.

NOP Requirement: §205.203 Soil fertility and crop nutrient management practice standard.

c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances

6.5	Toprak iyileştirme ve koruma planınız var mı ve	Toprağın iyileştirilmesi ve korunması adına
	tatmin edici mi? LÜTFEN TOPRAK İYİLEŞTİRME VE	yürütülen işlemler şunlardır: Toprak
	KORUMA PLANINIZI AÇIKLAYINIZ.	iyileştirme konusunda dökümante edilmiş
		bir prosedür, talimat bulunmuyor.

Issue 1: 6.5 Toprağın patojen, ağır metal ve kimyasal bulaşma kaynaklarından korunması ve toprağın iyileştirilmesi konusunda dökümante edilmiş bir prosedür, talimat bulunmuyor. There is no procedure how to protect the soil, improve organic matter and to avoid contamination from residues, pathogenic organisms, heavy metals.

NOP Requirement §205.661 Investigation of certified operations.

(a) A certifying agent may investigate complaints of noncompliance with the Act or regulations of this part concerning production and handling operations certified as organic by the certifying agent. A certifying agent must notify the Program Manager of all compliance proceedings and actions taken pursuant to this part.

Issue 2: 18.1 Üreticinin şikâyetlerle ilgili bir prosedürü yok, dolayısıyla alınan ve takip edilen bir şikâyet olmamış. Söz konusu olabilecek ürünlerin nasıl ele alınacağı konusu açık değil.

18.1.Incase a complaint received from any parties for a specific lot of product, there is no procedure explaining how to act for that product to protect organic integrity

18.	1 205.103(b)(4), 205.201(a)(1- 6)	Organik yönetmeliklere uyumla ilgili şikayetleri belgelendirmek ve değerlendirmek için prosedürleriniz var mı? LÜTFEN ŞİKAYET PROSEDÜRÜNÜZÜ AÇIKLAYINIZ.	Üreticinin şikâyetlerle ilgili bir prosedürü yok, dolayısıyla alınan ve takip edilen bir şikâyet olmamış. Söz konusu olabilecek ürünlerin
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Fatih Aksoy

Notification of Noncompliance

2	044	E (11	A rit	f C	ürd	Ы
7	U44	⊢- ι	"	Arii	IG	uro	ıaı

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Date	15.07.2015
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Dear Madam / Sir: Arif Gürdal Date: 29.07.2016

On the dates **20.07.2016** ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **20.07.2016**, ETKO determined the outstanding noncompliances in your file / operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **29.08.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Fatih AKSOY from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number: 2016.1

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance

2044F-01 Arif Gürdal

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Noncompliances:

Reviewer name & signature:

Noncompliance	25.							
		16.1	Major 🔀	Minor	Inspection			
Noncompliance	No				Date	20.07.2016		
Date of Notificat	Date of Notification 29.07.2016 Due Date 29.08.2016							
Noncompliance :								
§205.203 Soil fertility and crop nutrient management practice standard.								
(a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.								
	(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and							
animal materials. (c) The producer must	manage plan	t and ani	imal materials to n	naintain or impro	ove soil organic	matter content in a manner that		
does not contribute to	contaminati	on of cro	ps, soil, or water b	-	_	ganisms, heavy metals, or residues		
of prohibited substant (1) Raw animal manur								
(i) Applied to land use			•					
		ss than 1	20 days prior to th	e harvest of a pr	oduct whose ed	ible portion has direct contact with		
the soil surface or soil	•	ess than 9	00 days prior to the	harvest of a pro	oduct whose edi	ble portion does not have direct		
contact with the soil s	urface or soil	particles	;	-		•		
(2) Composted plant a (i) Established an initia			_	•				
* * *					in-vessel or sta	tic aerated pile system; or		
(iii) Maintained a temperiod, the materials r					a windrow comp	osting system, during which		
(3) Uncomposted plan		u a miiii	mum of five times.					
4.1 Kompostlama	tekniği uy	gun and	cak C:N oranı, s	ıcaklık ve akt	arma konusu	nda kayıt sitemi		
geliştirilmemiş.								
Composting techn	ilques appi		205.203c2	o recording o		eat and turning		
Inspection	NOD roa		205.20302		ETKO rules ref.			
criteria	NOP reg	. rei			ruies rei.			
Action taken:								
Please identify the s	unnorting d	ocumen	ts if anv					
Name, Surname			Gürdal		2	7.07.2016		
Signature of App					Date			
Review Date					R	esolved		
					U	nresolved		
Review Comment:								

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: ma@etko.org; (b) (6

Subject: Notification of Non-Compliances- Arif Gurdal 2044F-01

Date: Friday, July 29, 2016 9:39:07 AM

Attachments: <u>image001.jpg</u>

NONC 2044F-01 Arif Gürdal.pdf Minor Issues- Arif Gurdal.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances and Minor Issues for Arif Gurdal 2044F-01. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

From: <u>Ceren BAYAZIT</u>

To: ; sm.ms.NOPACAAdverseActions
Subject: Notification of Resolution of Non-Compliances for Arif Gürdal 2044F-01

Date: Thursday, September 01, 2016 9:21:38 AM

Attachments: <u>image001.jpg</u>

image001.jpg NRONC 2044F-01 Arif Gürdal.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Arif Gürdal 2044F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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Notification of Resolution of Noncompliance 2044F-01 Arif Gürdal

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Dear Madam / Sir: Arif Gürdal Date: 01.09.2016

On the date 20.07.2016 ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s).

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely

Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance:

NC number(s): 16.1 See below forms

Outstanding noncompliance : None
 None

NC number(s):

Notification of Resolution of Noncompliance 2044F-01 Arif Gürdal

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15.07.2015
00
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Resolved N	loncomp	oliance	es:				
		16.1					20.07.2016
Noncompliance No)		Major 🔀	Minor	Inspectio Date	n	
		12.08.	2016		Date		12.09.2016
Date of Notification	า	12.00.	2010		Due Date	,	12.03.2010
Noncompliance :	•				Due Dute		
§205.203 Soil fertility (a) The producer must selesoil and minimize soil eros (b) The producer must ma (c) The producer must ma contamination of crops, so materials include: (1) Raw animal manure, w (i) Applied to land used fo (ii) Incorporated into the sparticles; or (iii) Incorporated into the surface or soil particles; (2) Composted plant and a (i) Established an initial C: (ii) Maintained a temperat (iii) Maintained a temperat be turned a minimum of f (3) Uncomposted plant ma	ect and implention. nage crop nutinage plant and bil, or water by thich must be or a crop not into in not less the soil not less the soil not less the sanimal material N ratio of between ture of between ture of between tures.	rients and I animal me plant nut composted tended for in 120 days an 90 days ls produce reen 25:1: in 131 °F a en 131 °F a	e and cultivation prosoil fertility through a terials to maintain rients, pathogenic of unless it is: human consumptions of the harvest of the harvest of the harvest of though a process and 40:1; and and 170 °F for 15 day, and 170 °F for 15 day, and 170 °F for 15 day, and 170 °F for 15 day.	h rotations, cover crop n or improve soil organ organisms, heavy meta on; est of a product whose st of a product whose of s that: s using an in-vessel or s ays using a windrow co	s, and the applic matter conte ls, or residues of edible portion edible portion of static aerated p mposting syste	icatio ent in of pro has d does r bile sy em, du	cal, chemical, and biological condition of n of plant and animal materials. a manner that does not contribute to shibited substances. Animal and plant irect contact with the soil surface or soil not have direct contact with the soil stem; or uring which period, the materials must temperature and mixing the
compost.			205.203(c)(2)		ETKO rule	0.0	205.203(c)(2)
Inspection criteria	NOP reg.	ref	203.203(0)(2)		ref.	E S	203.203(0)(2)
Action taken: The	record sys	tems r	egarding C:N r	ratio, temperatu	re and mix	ing	are developed as indicated
in Annex-1 with a	_		-8a. a8 a	ano, temperata			
Please identify the sup	porting docui	ments, if	any: Annex-1 Re	ecord System of Con	nposting		
		Arif (Gürdal				
Name, Surname an					Date		
Signature of Appl.							
Review Date	11.08.2016 Review Date					Re	solved 🔀
						Un	resolved
Review Comment:	Annex-1 F	Record S	System of Con	nposting is checl	ked. The te	mp	eratures and the frequency
	-			•	_		e C:N ratio values are
	_						ble of Properness and
Properties of Several Organic Substances to be Composted. Their declaration is also provided. Besides, the waste utilization for composting is evaluated.							
Reviewer name & s	signature:	Fatih A	ksoy				

Notification of Noncompliance 3214 Belagro

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
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Dear Madam / Sir: Vyacheslav Belov Date: 17.10.2016

On the dates (06.09.2016) ETKO Inspector (b) (6), (b) (7)(C) realized annual surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **06.10.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.11.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by email at: ma@etko.com.tr; info@etko.com.tr

Sincerely

Enclosure: Inspection report number: 3214-2016.ma

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance 3214 Belagro

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Non-compliances:

Operator unit	no.	321	.4	Unit na		Belagr	·0				
Location - Add	isova str., Bro	vary city, I	Kiev region	ev region, 07400, Ukraine							
		· ·									
Initial Inspection			Surveillance	Surveillance Inspection			Report no 3	3214-2016.ma			
		Std or rog Art									
			Recping		Std or reg. Art. nr IACB7.5.2.1d, NO			NCR No 2016.1			
nonconformity					205.103b		•				
Inspection Dat	e		06.10.2016	06.10.2016							
Date of Notific	ation		17.10.2016	17.10.2016			Due Date 17.11.2016				
☐ Major											
☐ Factors causing risk on the product					⊠ Fa	☐ Factors causing no risk on the condition of the product.					
☐ Use of inputs which are not allowed by the regulations.					ns. 🔲 Pi	☐ Production process plan partly implemented.					
☐ Non-Organic product sales as organic.											
☐ Requiremer	☐ Requirements of regulation or standard not applied										
☐ Frequent minor non-conformities on the same											
requirement of regulation.											
Customer co				_							
remedial actions, or complaints and action records not											
available.	ao liconcos	and c	ortificatos								
☐ Production											
☐ FTOddction	ргосезз рі	annot	implemented								
			Descrip	tion of No	nconformi	v bv Ins	pector				
§205.103 Record	lkeening h	, certifi	-				•				
		=	="	erning the	nroduction	narvestin	g and handling	of agricul	tural products that are or		
				_	•			_	nic (specified ingredients		
or food group(s)).				•	Ü	, ,	ŕ	J	()		
(b) Such records r	nust:										
(1) Be adapted to	the particu	ılar busi	iness that the ce	rtified oper	ation is cond	lucting;					
(2) Fully disclosunderstood and			nd transaction	s of the ce	rtified ope	ration ir	n sufficient de	etail as to	be readily		
(3) Be maintained			vears hevond t	heir creatio	n· and						
						ogulatio	one in this no	.+			
(4) Be sufficient			•			_	•		and have a large and have dependent		
(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent. Issues: - Lot nr is not mentioned with B/L and invoice Status of product is not mentioned with B/L											
Issues: - Lot nr i	is not mer	ntioned	d with B/L and	Invoice.	- Status of	oroduct	is not mention	ned with	ı B/L		
Inspector Name and signature b) (6). (b) (7)(C) Operator name and signature Vyacheslav Belov											
			Cor	rective Ac	tion Plan b	/ Opera	tor				
Target date	17.11.20	16	Operator name		Vyacheslav Belov	,	Actual Comp	letion			
Verification of Operator's corrective action and implementation by ETKO											
Accepted: Y	ES 🗍	νо Γ	Da	re l		FTK	(O approval				
Explanations											

Notification of Noncompliance 3214 Belagro

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	Unit	t name	ne Belagro							
Location - Address 2, L	sova str., Brovary city, Kiev region, 07400									
Initial Inspection	Surveillance Inspect	ion 🛚	Report n		Report no 3	3214-2016.ma				
Subject of Labell		Std o	or reg. Art. nr. IACB7.5.2,				2046.0			
nonconformity Labell	b		P 205.307		NCR No 20		2016.2			
Inspection Date	06.10.2016									
Date of Notification	17.10.2016		Due Date 17.11.2			17.11.2016				
⊠ Major I		☐ Minor								
☐ Factors causing risk on the p	[☐ Factors causing no risk on the condition of the product.								
☐ Use of inputs which are not	ons. [☐ Production process plan partly implemented.								
☐ Non-Organic product sales a										
□ Requirements of regulation	or standard not applied	ed								
☐ Frequent minor non-confor	mities on the same									
requirement of regulation.										
Customer complaints not ha										
remedial actions, or complaint	s and action records no	t								
0.10.10.0.0	available. Misuse of the licenses and certificates									
☐ Production process plan not										
	. implemented.									
	Description of N	onconfo	rmity l	bv Ins	pector					
\$205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."										
(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic										
ingredients may display the following terms or marks:										
ingredients may display the fol			essed	agricu	Itural produc	t labeled	as containing organic			
ingredients may display the fol (1) The name and contact information of	lowing terms or marks:				-		as containing organic			
	lowing terms or marks: the certifying agent which cer				-		as containing organic			
(1) The name and contact information of(2) Identification of the product as organ(3) Special handling instructions needed	lowing terms or marks: the certifying agent which certic;	tified the I	handler v		-		as containing organic			
(1) The name and contact information of(2) Identification of the product as organ(3) Special handling instructions needed(4) The USDA seal;	lowing terms or marks: the certifying agent which cer ic; to maintain the organic integri	tified the l	handler v	which as	ssembled the fina	l product;				
(1) The name and contact information of(2) Identification of the product as organ(3) Special handling instructions needed	lowing terms or marks: the certifying agent which cer ic; to maintain the organic integri	tified the l	handler v	which as	ssembled the fina	l product;				
 (1) The name and contact information of (2) Identification of the product as organ (3) Special handling instructions needed (4) The USDA seal; (5) The seal, logo, or other identifying management 	the certifying agent which certic; to maintain the organic integriant of the certifying agent that to ship or store raw or p	tified the lety of the processed	handler v product; the organ	which as	essembled the final uction or handling	I product;	that produced or handled			
 (1) The name and contact information of (2) Identification of the product as organ (3) Special handling instructions needed (4) The USDA seal; (5) The seal, logo, or other identifying mather finished product. (b) Nonretail containers used to 	lowing terms or marks: the certifying agent which certic; to maintain the organic integril ark of the certifying agent that to ship or store raw or production lot number of	ty of the p certified ti	handler v product; the organ d agrico oduct if	which as nic produ ultura f appli	ssembled the final distribution or handling a product laborable.	I product;	that produced or handled			
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Notification of Noncompliance 3214 Belagro

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Operator unit no).	3214	4	Unit	name	Belagr	ro		
Location - Addres	SS	2, Lis	, Lisova str., Brovary city, Kiev			07400,	Ukraine		
Location 7 address	33								
Initial Inspection	Surveillance Inspection			on 🛚	Report no 3214-2016.ma			.ma	
Subject of	1_					Art. nr	IACB		2015 2
nonconformity	Pr	ohibi	ted substances		_		P 205.105.a	NCR No	2016.3
Inspection Date			06.10.2016						
Date of Notificat	ion		14.10.2016				Due Date		14.11.2016
		Majo	or				⊠ Mino	or M1-8.1	1
☐ Factors causin	ıg risk on t	he pr	oduct		☐ Fac	tors cau	using no risk on	the condit	ion of the product.
☐ Use of inputs v	which are	not a	llowed by the reg	gulatio	ns. 🛛 🖂 Pro	oductio	n process pla	n partly i	mplemented.
☐ Non-Organic p	oroduct sa	les as	organic.						
☐ Requirements	of regula	tion o	or standard not a	pplied					
☐ Frequent mind	or non-cor	nform	nities on the same	j					
requirement of re									
			ndled, failure on t	_					
	, or compl	aints	and action record	ds not					
available.	1:								
☐ Misuse of the									
☐ Production pro	ocess piar	noti	impiementea.						
			Description	of No	nconformity	bv Ins	spector		
§205.105 Allowed	and prohib	ited si			-		•	d handling	1 .
To be sold or labele product must be pro	d as "100 p	ercen	t organic," "organic	c," or "ı	-	_	-	_	
(a) Synthetic subs	tances an	d ing	redients, except	as prov	vided in §20	5.601	or §205.603;		
(b) Nonsynthetic sub	ostances pr	ohibit	ed in §205.602 or §	205.604	4;				
(c) Nonagricultural s	ubstances	used ii	n or on processed p	roducts	s, except as of	therwise	e provided in §2	.05.605;	
(d) Nonorganic agric			-		-		-		5.606:
(e) Excluded method			· ·		•	=	•		
(f) Ionizing radiation	=							3_00	
(g) Sewage sludge.	,					.,			
	lte chow 9	27 cuk	hetances and NOI	2611	1 Drohihita	d cubet	tances indicat	oc 101 cu	bstances so there is
big gap of chemic				2011	.1 Fiolibite	u subsi	iances muicat	.es 191 su	bstances so there is
Inspector Name a	ınd signat	ure	(b) (6), (b) (7)(C)	Operator na	rator name and signature Vyacheslav Belov			
			Correct	ive Act	tion Plan by	Opera	tor		
Target date 1	7.11.2016) I	perator name an		Vyacheslav Belov		Actual Comp	letion	
	Verif	ficatio	on of Operator's	correct	tive action a	nd imp	olementation	by ETKO	•
Accepted: YES		10 [Date			ЕТИ	(O approval		
Explanations:	<u> </u>	NO	_ Date			LIK	o approval		
Explanations.									

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>Tov-belagro@ukr.net</u>

Subject: Notification of Non-Compliances_ Belagro 3214D-01

Date: Monday, October 17, 2016 3:27:58 AM

Attachments: <u>image001.jpg</u>

image001.jpg 3214D-01 Belagro NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Belagro 3214D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6

Subject: Notification of Resolution of NonCompliances_ Belagro 3214D-01

Date: Friday, January 20, 2017 7:00:28 AM

Attachments: <u>image001.jpg</u>

NRONC 3214D-01 Belagro.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Belagro 3214D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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Notification of Resolution of Noncompliance

3214D-01 Belagro

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Dear Madam / Sir: Vyacheslav Belov Date: 21.12.2016

On the dates (06.10.2016) ETKO Inspector Mr. (6) (6), (7)(C)) realized annual surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection reports dated **17.10.2016** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by email at: fa@etko.com.tr

Sincerely
Fatih AKSOY

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

• Closed noncompliance: 3

NC number(s): **16.1, 16.2, 16.3 See below forms**

• Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance 3214D-01 Belagro

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Operator unit no.	3214	4	Unit	name	Belagr	0		
Location - Address		sova str., Brov	111 (21111)					
Initial Inspection		Surveillance	Inspecti	on 🛛		Report no 3	214-2016	.ma
ubject of	- Laboration	ediants.		Std or reg	Art nr		Neg at	
onconformity	Record	Keeping		The State of the S		P 205.103b2	NCR No	2016.1
nspection Date		06.10.2016		1 1000000000000000000000000000000000000			*	
Date of Notification		17.10.2016				Due Date		17.11.2016
	☐ Majo	or				⊠ Mir	or M1-9.	6
☐ Factors causing risk	on the pr	oduct		⊠ Fa	ctors cau	using no risk or	the condit	tion of the product.
Use of inputs which	are not a	llowed by the	regulatio	ns. 🗆 Pr	oductio	n process pla	n partly in	nplemented.
☐ Non-Organic produ	ct sales as	organic.						
Requirements of re	gulation o	r standard no	t applied					
☐ Frequent minor no	n-conform	ities on the sa	me					
requirement of regula								
Customer complaints				ial				
actions, or complaints an			oie.					
☐ Misuse of the licens								
☐ Production process	pian not i	mpiementea.						
		Docerint			1.2			
			ion of No	onconformit	v by Ins	pector		
(a) A certified operation rethat are intended to be so for food group(s))."	nust mainta	ed operations.	erning the		narvestin	g, and handling		
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a) A certified operation of that are intended to be so or food group(s))." b) Such records must: 1) Be adapted to the part 2) Fully disclose all according and audited and audited and audited and audited and audited and audited are considered and audited are considered and audited and audited are considered and audited and audited are considered and audited are considered and audited and audited are considered and audited and audited are considered and audited are considered and audite	ticular busin tivities an ed; less than 5 monstrate in must make cretary, the mentioned ignature successue and we product a here it is morganic product and the product and th	d operations. ain records conce, or represented the concess that the cerd transactions years beyond the compliance we such records a applicable State with B/L and (b) (c) (c) (c) (c) (d) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	erning the as "100 p rtified ope s of the coneir creativith the Available for program invoice. (7)(C) ective Accomplian mber cleat without it and	e production, I ercent organication is conduction is conduction; and act and the properties of the second of the s	narvestin c," "orga lucting; ration ir regulation and copy tate office product ame and y Operat 33b. We ated ins for statu	g, and handling nic," or "made n sufficient de nons in this paing during normala, and the certis not mention de signature tor will prepare structions for us of the product	etail as to rt. nal busines: rtifying age: bned with trade doc transport duct in all	be readily s hours by authorized int. B/L Vyacheslav Belo suments and labels of goods in Ukrain documents — not 13.12.2016

Notification of Resolution of Noncompliance 3214D-01 Belagro

Nr	GP 18 F 11
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Operator unit no.	3	214 U	nit nam	e Be	lagro		
Location - Address	2	, Lisova str., Brovary ci	ty, Kiev	region, 074	400, Ukraine		
Initial Inspection	ection [×	Report no 3	214-2016	.ma		
Subject of nonconformity	Labe	elling	1374	or reg. Ar	t. nr. IACB7.5.2,	NCR No	2016.2
Inspection Date		06.10.2016				-	
Date of Notification		17.10.2016			Due Date		17.11.2016
	⊠ Majo	r M2-9.2				Minor	F
☐ Factors causing r	sk on the	product		☐ Factor	s causing no risk on	the condit	ion of the product.
☐ Use of inputs wh	ch are no	t allowed by the regula	itions.	☐ Produ	ction process pla	n partly ir	nplemented.
■ Non-Organic pro	duct sales	as organic.					
		on or standard not app	lied				
		ormities on the same					
requirement of regu	lation.						
☐ Customer compl	ints not	handled, failure on taki	ng				
remedial actions, or	complair	nts and action records n	ot				
available.		7.00					
☐ Misuse of the lice	enses and	certificates					
☐ Production proce	ss plan n	ot implemented.					
			4				
		Description of	Noncor	formity by	Inspector		
"100 percent organic,"	"organic,	containers used for only s " or "made with organic (s only to ship or store ra	specified	ingredients	or food group(s))."		
ingredients may dis	olay the f	ollowing terms or mar	ks:				
(1) The name and contact	information	of the certifying agent which	certified t	he handler wh	ich assembled the fin	al product;	
(2) Identification of the pr	oduct as org	anic;					
(3) Special handling instru	ctions need	ed to maintain the organic inte	egrity of th	e product;			
(4) The USDA seal;							
(5) The seal, logo, or other	identifying	mark of the certifying agent t	hat certifie	ed the organic	production or handlin	g operation	that produced or handled
the finished product.							
	ners used	to ship or store raw or	rproces	sed agricul	tural product lab	eled as co	entaining organic
(b) Nonretail contai							mitaning organic
		production lot number		product if a	applicable.		ontaining organic
ingredients must di	play the		of the				ontaining organic
ingredients must di Issues: - Label appro	play the	production lot number the export, so produc	t transp	orted to U			Vyacheslav Belov
ingredients must di	play the	production lot number r the export, so produc e (b) (6), (b) (7)(C)	t transp	orted to U	S without label e and signature		
ingredients must dis Issues: - Label appro Inspector Name and From now never pro	play the oved after signatur	production lot number r the export, so produc e (b) (6), (b) (7)(C)	Ope Action	orted to Us rator name Plan by Op . Please fin	S without label e and signature perator ad attached our d		Vyacheslav Belov
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Ingredients must dis Issues: - Label appro Inspector Name and From now never pro transporting does n	play the ved after signature oducts with the control of the contro	r the export, so produce (b) (b) (b) (7)(c) Corrective Il be transported without transport any organi Operator name and	Ope Action Out label c product Vyac Belo	orted to Use rator name Plan by Op . Please fin cts without cheslav	e and signature perator ad attached our of t labels and refer Actual Comp date	ring to th	Vyacheslav Belov n. Instruction for e status.
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Notification of Resolution of Noncompliance 3214D-01 Belagro

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Operator unit no.	321	4	Init name	Belagro				
Location - Address	2, L	isova str., Brovary ci	ity, Kiev region, (7400, Ukraine				
		1		-				
Initial Inspection		Surveillance Inspe	ection 🛚	⊠ Report no 3214-2016.ma				
Subject of nonconformity	Prohibi	ited substances		Art. nr. IACB 4a, NOP 205.105.a	NCR No 2016.3			
Inspection Date		06.10.2016						
Date of Notification	n	14.10.2016		Due Date	14.11.2016			
	☐ Maj	or		⊠ Mir	or M1-8.11			
☐ Factors causing	risk on the pr	roduct	☐ Fact	ors causing no risk or	the condition of the product.			
☐ Use of inputs wh	nich are not a	allowed by the regula	ations. No Pro	duction process pla	an partly implemented.			
☐ Non-Organic pro	duct sales as	s organic.						
and the second second second second	own or done	or standard not appl	lied					
☐ Frequent minor								
requirement of reg								
☐ Customer compl	laints not har	ndled, failure on taki	ng					
remedial actions, o	r complaints	and action records r	not					
available.								
☐ Misuse of the lic	enses and ce	ertificates						
AND DESCRIPTION OF THE PARTY OF	and also make	implemented						
☐ Production proc		Description of	f Nonconformity	A FOR INCOME	OMITS AND THE			
\$205.105 Allowed an To be sold or labeled a product must be prod (a) Synthetic substa (b) Nonsynthetic substa (c) Nonagricultural substa (d) Nonorganic agricul (e) Excluded methods, (f) lonizing radiation, a (g) Sewage sludge.	as "100 percer luced and hand ances and ing tances prohibit ostances used litural substance, except for vac	Description of substances, methods, and organic," "organic," dled without the use orgredients, except as ted in §205.602 or §200 in or on processed process used in or on process ccines: Provided, That, Food and Drug Administrations.	or "made with orgof: provided in §20: 5.604; ducts, except as others of the vaccines are application regulation	prganic production at anic (specified ingred) 5.601 or §205.603; herwise provided in § pt as otherwise proviproved in accordance, 21 CFR 179.26; and	dients or food group(s))," the 205.605; ded in §205.606;			
\$205.105 Allowed and To be sold or labeled approduct must be product from the product must be product from the product must be product from th	as "100 percer luced and hand ances and ing tances prohibi ostances used ltural substance, except for vac as described in	Description of substances, methods, and organic," "organic," dled without the use of gredients, except as ted in §205.602 or §200 in or on processed process used in or on process coines: Provided, That, a Food and Drug Administratory and NOP 2	or "made with orgof: provided in §20: 5.604; ducts, except as others of the vaccines are application regulation	prganic production at anic (specified ingred) 5.601 or §205.603; herwise provided in § pt as otherwise proviproved in accordance, 21 CFR 179.26; and	dients or food group(s))," the 205.605; ded in §205.606; e with §205.600(a); tes 191 substances so there			
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\$205.105 Allowed an To be sold or labeled a product must be product must be product must be product must be product must be product substantial to the product substantial sub	as "100 percer luced and hand ances and ing tances prohibit ostances used litural substance, except for vac as described in s show 87 su as screened. 1 d signature	Description of substances, methods, and organic," "organic," dled without the use of gredients, except as ted in §205.602 or §200 in or on processed process used in or on processed in or on processed process. Provided, That, Food and Drug Administrances and NOP 2 (b) (c), (b) (7) (c) (c) (c) (d) (d) (d) (d) (d) (d) (d) (d) (d) (d	or "made with orgof: provided in §205 5.604; ducts, except as other seed products, except as other except as o	priganic production and anic (specified ingred) 5.601 or §205.603; herwise provided in §205.603 in §205.603 in §205.603 Pot as otherwise proviproved in accordance, 21 CFR 179.26; and in substances indicated in §205.600	dients or food group(s))," the 205.605; ded in §205.606; with §205.600(a); tes 191 substances so there Vyacheslav Be s are covered pletion 13.12.2016			
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From: <u>Ceren B.</u>

To: <u>sm.ms.NOPACAAdverseActions</u>; <u>MUSTAFA AKYUZ</u>
Subject: ETKO- Notification of Non-Compliances for Analyses

Date: Monday, September 26, 2016 9:59:40 AM
Attachments: NONC 3080F-02 Diana. ANALYSES.pdf
NONC 3080F-01 Rin Agro. ANALYSES.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-compliances for Analyses for 3080F-02 Diana and 3080F-01 RinAgro.

Best regards,

Ceren Bayazit

Notification of Noncompliance 3080F-01 Rin Agro

Nr	GP 18 F 10
Date	15.07.2015
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Date: 26.09.2016

Dear Madam / Sir: Okunenko Igor Nicolaevich

On the dates **04.08.2016** ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
	Sunflower	3080F-01		Chlormequat	0,023	None	0.01	Noncompliance
2016-20361	Plants	Rinagro	Field No					
	Soybean	3080F-01	Field No 🗀 🖰	Chlormequat	0,139	None	0,01	Noncompliance
2016-20360	Plants	Rinagro	_	_				_

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **26.10.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYUZ from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3080F-01 Rin Agro

Nr	GP 18 F 10
Date	15.07.2015
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Noncompliances:

Noncompliance No		15.6	Major [X	Minor		Inspectio	n Date	04.08.2016
Date of Notification		26.09.20	16				Due Date		26.10.2016
Noncompliance: §205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of: (a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603; (b) Nonsynthetic substances prohibited in §205.602 or §205.604; (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605; (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606; (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a); (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and (g) Sewage sludge.									
Issues:									
Detection of chemical substances in organic products. See above listed laboratory results and analyses report.									
Inspection			205.105 (a,	,e)			ETKO rul	es ref.	5.9
criteria Action taken	NOP reg. r	ef							
Please identify the supp									
riease identity the supp	orting docum		ko Igor Nico	laevio	h				
Name, Surname and Signature of Appl. R							Date		
Review Date		·I						Resolved	
								Unresolve	d 🔲
Review Comment:									
Reviewer name & signature:									

Notification of Noncompliance 3080F-02 Diana

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Date: 26.09.2016

Dear Madam / Sir: Ferens Vasiliy Ivanovich

On the dates **05.08.2016** ETKO Inspector (b) (6), (b) (7)(C) realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
51610020	Barley seeds	3080F-02 Diana	Field No	Chlorpyrifos	0,04	None	0.01	Noncompliance

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

• Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **26.10.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYUZ from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance 3080F-02 Diana

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Noncompliances:

Noncompliance No)	15.6	Major [X	Minor		Inspection	n Date	04.08.2016
							26.10.2016		
Noncompliance: §205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of: (a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603; (b) Nonsynthetic substances prohibited in §205.602 or §205.604; (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605; (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606; (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a); (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and (g) Sewage sludge.									
Issues:									
Detection of chemical substances in organic products. See above listed laboratory results and analyses report.									
Inspection			205.105 (a,	,e)			ETKO rul	es ref.	5.9
criteria Action taken	NOP reg.	ref							
Please identify the supp									
riease identity the supp	or ting docur		<u>y.</u> Vasiliy Ivano	vich					
Name, Surname an	d		,				Date		
Signature of Appl. F									
Review Date		I						Resolved	
						Unresolve	d 🗌		
Review Comment:									
Review Comment: Reviewer name & signature:									

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notification of Resolution of Non-Compliances- Efal 2325F-01

Date: Tuesday, August 30, 2016 11:03:12 AM

Attachments: <u>image001.jpg</u>

image001.jpg NRONC 2325F-01 EFAL.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Efal 2325F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>ma@etko.org</u>; <u>fa@etko.org</u>; (b) (6

Subject: Notification of Resolution of Non-Compliances- Efal 2325F-01

Date: Friday, August 05, 2016 11:22:56 AM

Attachments: <u>image001.jpg</u>

2325F-01 EFAL GP 18 F 10 Notification of Noncompliance NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Efal 2325F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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Date	15.07.2015
Rev	00
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2325F-01 EFAL

Dear Madam / Sir: Aytekin METE	Date: 01.08.2016
On the dates (19.07.2016) ETKO Inspector Mr./ Mrs (b) (6), (b) (7) (c) initial / continuing / recertification / surveillance inspector (the review was to ensure the completeness of your application your organic operation's compliance against the regulation (s):	tion to your operation. The objective
USDA National Organic Program	1
Based on the application review findings / inspection report dated. outstanding noncompliances in your file / operation(s)	19.07.2016 , ETKO determined the
Please note that, for each noncompliance you MUST act on in due tin	ne as indicated:
 Please record your corrective action on the boxes "Action also submit any supporting documents/records as required box 	
Send a rebuttal with the supporting documents/evidences	
Failure to resolve the outstanding non-compliances will result in	
 suspension or revocation your certification, or denial of your certification 	
Your response must be submitted to the following address, not later days, starting from the date of this notification)	than 30.08.2016 (in 30
ETKO	
160 Sok. 13/3 35040 Bornova – İzmir/1	TURKEY
If you have any questions regarding the inspection findings or of the sactions please contact to Mr. Fatih AKSOY from ETKO +90-232-33976 fa@etko.org, info@etko.org	
Sincerely	
Enclosure: Inspection report number:	

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

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Date	15.07.2015
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2325F-01 EFAL

Nο	nco	mn	lian	ces:
110	1100	HILL	Hall	CC3.

Noncomplian	ces:								
		16.1	Major 🔀	Minör 🗌	Inspectio	n 1	9.07.2016		
Noncompliance No		04.00.0	<u> </u>		Date				
Date of Notification		01.08.20	016		Due Date		0.08.2016		
Noncompliance:					Due Date	<u> </u>			
205.103 Recordke	ening by co	ertified (operations.						
(a) A certified operation must maintain records concerning the production, harvesting, and handling of									
agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent									
organic," "organic," or "made with organic (specified ingredients or food group(s))."									
(b) Such records mu									
(1) Be adapted to the				•					
		and trans	sactions of the	e certified opera	ation in suf	ficient	detail as to be readily		
understood and aud	•	than ⊏		la sin sus ati an . a	al				
(3) Be maintained for (4) Be sufficient to (•			in thic	nart		
(c) The certified ope					_		•		
					•		program's governing State		
official, and the cert				,, ,,,					
•	, , ,								
205.103.a.b.c The	producer c	ouldn't	submit the re	cords related to	purchase	and s	ale and, the harvest		
•	-		•		which typ	e of p	roducts were harvested		
providing the dates	and their	buyers a	aren't present	t on their files.					
Inspection			205.103.a.b.c		ETKO rule	20			
criteria	NOP reg. r		205.105.a.D.C		ref.				
Action taken	1101 108.1	CI			TCI.				
riction taken									
Please identify the supp	orting docum	nents, if ar	ny:						
Name. Surname and	4				Date				
Signature of Appl. R	-				Date				
Signature of Appli. It	100 100								
Review Date						Reso	lved		
Unresolved									
Review Comment:									
Reviewer name & s	ignature:								

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Date	15.07.2015
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2325F-01 EFAL

		16.2	Danier M	NA: m ii m	Inconnetion	10.07.2016				
Noncompliance No	,	16.2	Major 🔀	Minör 🔛	Inspection Date	19.07.2016				
Noncompliance No	,	01.08.2	2016		Date	30.08.2016				
Date of Notification	า				Due Date					
Noncompliance :					·					
205.202 Land req	205.202 Land requirements.									
	Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as									
"organic," must:										
(a) Have been man	•		•		•	•				
preceding harvest			es, as listed in s	3205.105, applie	ed to it for a	period of 3 years immediately				
, ,	•		and huffer zon	nes such as runo	off diversions	to prevent the unintended				
• •						ubstance applied to adjoining				
land that is not und			•							
		Ū								
	_		•			y two areas of the producer's				
fields. There is no	Buffer Zoi	ne indic	ation on the m	aps of these tw	o areas.					
la sa sati sa			205 202 -		ETKO milaa					
Inspection criteria	NOP reg.	rof	205.202.c		ETKO rules ref.					
Action taken	NOP leg.	TEI			Tet.					
Action taken										
Please identify the supp	orting docu	ments, if a	any:		 					
Name, Surname an	٨				Data					
Signature of Appl. I					Date					
Signature of Applica	1000.									
Review Date					l F	Resolved 🗌				
					ι	Jnresolved 🗌				
Review Comment:										
Reviewer name & s	ignature:									
Reviewer name & signature:										
ì										

Notification of Resolution of Noncompliance 2325F-01 EFAL

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
Page	1/3

Dear Madam / Sir: Aytekin METE Date: 30.08.2016

On the date (19.07.2016) ETKO Inspector (b) (6), (b) (7)(C) realized continuing inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:

ma@etko.org, info@etko.org .

Sincerely Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 2

NC number(s): **16.1, 16.2, See below forms**

Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance 2325F-01 EFAL

Nr	GP 18 F 11
Date	15.07.2015
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Resolved Noncompliances:									
		16.1	Major 🔀		Minör		Ir	nspection	19.07.2016
Noncompliance No)						D	ate	
		01.08.20)16						30.08.2016
Date of Notification	า						D	ue Date	
Noncompliance:									
205.103 Recordkeeping by certified operations.									
(a) A certified operation must maintain records concerning the production, harvesting, and handling of									
agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent									
organic," "organic,"		e with org	anic (specifi	iec	d ingred	ients	or fo	od group	(s))."
(b) Such records m									
(1) Be adapted to t						•			
		and trans	sactions of t	he	certifie	d ope	eratio	on in suffi	cient detail as to be readily
understood and au	•								
(3) Be maintained f									
(4) Be sufficient to		•					_		•
									copying during normal
•		•	itatives of tr	ne	Secreta	iry, th	ie app	piicable S	tate program's governing State
official, and the cer	titying age	ent.							
205 102 a b a Tha	producor	couldn't	cubmit tha		orde re	latad	l to n	urchaca	and sale and, the harvest
	-								of products were harvested
providing the date	-		-					men type	of products were harvested
providing the date	J and the	. buyers c	aren e prese		on the	·······································	J.		
Inspection			205.103.a.b).C			F.	TKO rules	·
criteria	NOP reg.							ef.	
Action taken		ı					<u> </u>		
See attachment for	r harvest a	and sellin	g records.						
Please identify the supp	orting docu		•						
Name, Surname an		Aytek	in METE						29.08.2016
Signature of Appl. F							l	Date	
	29.08.2	2016							Resolved 🔀
Review Date									
Unresolved									
Review Comment:									
Harvest and selling records were provided to ETKO, (see annex NC 1)									
Reviewer name & signature: Mustafa AKYÜZ									

Notification of Resolution of Noncompliance 2325F-01 EFAL

Nr	GP 18 F 11
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	Т						
		16.2	Major 🔀	Minör 🔙	Inspection	19.07.2016	
Noncompliance No)				Date		
		01.08.2016				30.08.2016	
Date of Notification	1				Due Date		
Noncompliance :	Noncompliance :						
205.202 Land requ	uirements						
Any field or farm pa	arcel from	which ha	rvested crops	are intended to	be sold, la	beled, or represented as	
"organic," must:						•	
(a) Have been man	aged in ac	cordance	with the prov	isions of §§205	.203 throug	h 205.206;	
(b) Have had no pro	hibited su	ubstances	s, as listed in §	205.105, applie	d to it for a	period of 3 years immediately	
preceding harvest of	of the crop	; and					
	•		and buffer zon	es such as runo	ff diversions	s to prevent the unintended	
						ubstance applied to adjoining	
land that is not und			•			,, ,	
205.202.c Some ne	eighborho	od conve	entional parcel	ls have been fo	und in only	two areas of the producer's	
fields. There is no	•		•		•	μ ο αι ο αι ο αι ο μ ο αι αι ο μ	
				.,			
Inspection			205.202.c		ETKO rules		
criteria	NOP reg.		203.202.0		ref.		
Action taken							
riction taken							
See attached maps							
Please identify the supp	orting docu	ments, if ar	ıv:				
, ''			in METE			29.08.2016	
Name, Surname an	d	•			Date		
Signature of Appl. F							
- 0	29.08.2	2016				Resolved X	
Review Date							
Unresolved							
Review Comment:							
Neview Comment.							
Mentioned parcels maps were provided to ETKO. Buffer zones are indicated on maps. (See annex NC 2)							
parameter parameter to a processor to a management of the parameter (and a miner to a)							
Reviewer name & c	ionature:	Mustafa	ΔΚΥΪΙΖ				
Reviewer name & signature: Mustafa AKYÜZ							

3141D-01 Ekolium

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/3

Date: 20.12.2016

Dear Madam / Sir: Alexey Khachkovskiy

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

USDA National Organic Program

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **17.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **12.12.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

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

Sincerely

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 2

NC number(s): **2016.1, 2016.2 See below forms.**

Outstanding noncompliance : None

NC number(s):

3141D-01 Ekolium

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/3

Outstanding Noncompliances:

Operator unit no.	3141	Unit name	Ekolium
Location - Address	9, Boryspilska Str, Kie	v, <mark>020</mark> 99, Ukraine	

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
--------------------	-------------------------	------------------------

Subject of nonconformity	Record Keeping		IAC	or reg. Art. n B7.5.2.1d, NO 5.103b2		NCR No	2016.1
Inspection Date	•	07.10.2016					
Date of Notification		17.10.2016			Due Date		17.11.2016
	☐ Maj	or			■ Mir	nor M1-9	.6
☐ Factors causing risk on the product			Factors causing no risk on the condition of the product.				
☐ Use of inputs which are not allowed by the regulations.				☐Production process plan partly implemented.			
☐Non-Organic product sa	ales as org	ganic.					
☐Requirements of regula	ition or st	andard not applied					
☐Frequent minor non-conformities on the same requirement of regulation.							
☐Customer complaints n actions, or complaints and							
☐Misuse of the licenses and certificates							
☐Production process plan	n not imp	lemented.					

Description of Nonconformity by Inspector

§205.103 Recordkeeping by certified operations.

- (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."
- (b) Such records must:
- (1) Be adapted to the particular business that the certified operation is conducting;
- (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
- (3) Be maintained for not less than 5 years beyond their creation; and
- (4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.
- (c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

Issues: - There is no status of organic on the BL loading documents and invoices of last shipment (last transaction number is TK.14.3141-013-C)

Inspector Name and signature (b) (6), (b) (7)(C)				Operator name and signature				Alexey Khackovskiy	
				Corrective A	ction Plan by O	pera	ator		
				e guarantee cone product and the	•		-		rade documents
Target date	Operator name and signature		Alexey Actual Complete Khackovskiy date		tion	12.12.2016			
	,	Verific	ation o	f Operator's corre	ective action and	d im	plementation b	у ЕТКО	
Accepted:	YES =	NO		Date	19.12.2016 ETKO approval		Mustafa AKYÜZ		
•		•		claration and wi nnex 1 and 2)	ll monitor the	ir fu	ture trade do	cuments	and labels

Notification of Noncompliance 3141D-01 Ekolium

Nr	GP 18 F 10
Date	15.07.2015
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Operator unit	no.	3141	L	Unit r	name	Ekoliu	ım		
Location - Add	ress	9, Bo	oryspilska Str, Kie	v, 020	99, Ukraine				
Initial Inspecti	on 🗆	•	Surveillance Ins	spectio	n =		Report no 3	141-2016.1	ia
Subject of nonconformity		Labellir	ng		Std or reg.		r. IACB7.5.2,	NCR No 2	016.2
Inspection Dat	te		07.10.2016						
Date of Notific			17.10.2016				Due Date	1	17.11.2016
■ Major M2-9.2						I	☐ Minor		
☐ Factors causing risk on the product] Factor	s causing no ris	k on the con	dition of the product.	
☐ Use of inputs	which are	not allov	ved by the regulation	ns.] Produ	ction process pl	an partly im	plemented.
☐ Non-Organic	product sa	les as org	ganic.						
			andard not applied						
regulation.			s on the same requi						
			d, failure on taking		al				
☐ Misuse of the			cords not available.						
☐ Production p	rocess pian	i not imp	iementea.						
			Description	of No	nconformity	by Ins	spector		
"100 percent org (a) Nonretail con may display the fi (1) The name and (2) Identification (3) Special handli (4) The USDA sea (5) The seal, logo produced or hand (b) Nonretail con display the produ	anic," "orgatainers use following to contact info of the produce in the produce i	anic," or do only to the transaction of the transac	"made with organion ship or store raw of narks: In of the certifying aganic; Ided to maintain the gamark of the certifying aganic.	c (specior processed oblicable. L loadi	ified ingredie essed agricult nich certified integrity of t ent that certified agricultural c), Ekolium ng documei	nts or fit tural pro- the han he product ged the or product did no- nts of la	ood group(s))." oduct labeled a dler which asse duct; organic product t labeled as cor	s containing mbled the fi ion or hand staining orga	ling operation that anic ingredients must roducts or number) Alexey
					•				Khackovskiy
Dloose find -+	tocked d	o ele ret			ion Plan by			c with an	rrect information
			ion. we prepar ransportation v						rect information
Target date	17.11.20	16	perator name an gnature		Alexey Khackovskiy	,	Actual Comp date	letion	12.12.2016
	Ve	erificatio	on of Operator's o	correct	ive action a	nd imp	olementation	by ETKO	
•	ES =	NO 🗆			19.12.2016		KO approval		a AKYÜZ
•	•		instruction for tescribed and se		_	•		_	

3141D-01 Ekolium

5

Date: 17.10.2016

Dear Madam / Sir: Alexey Khachkovskiy

On the dates (07.10.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the resultation (a):

USDA National Organic Program

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

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

the regulation (s):

• Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

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

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

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

3141D-01 Ekolium

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
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Non-compliances:

Operator unit no.	3141	Unit name	Ekolium
Location - Address	9, Boryspilska Str, Kie	v, 02099, Ukraine	2

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
--------------------	-------------------------	------------------------

Subject of nonconformity	Record	Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2			NCR No	2016.1
Inspection Date		07.10.2016					
Date of Notification		14.10.2016			Due Date		14.11.2016
	Majo	r			Mine	or M1-9.6	5
Factors causing risk on	the pro	duct		Factors caus	ing no risk on t	ne conditio	on of the product.
Use of inputs which are	e not allo	owed by the regulation	s.	Production process plan partly implemented.			
Non-Organic product s	ales as o	organic.					
Requirements of regula	ation or	standard not applied					
Frequent minor non-correquirement of regulation		ies on the same					
Customer complaints r remedial actions, or co- available.		,	t				
Misuse of the licenses	and cert	ificates					
Production process pla	n not im	plemented.					

Description of Nonconformity by Inspector

§205.103 Recordkeeping by certified operations.

- (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."
- (b) Such records must:
- (1) Be adapted to the particular business that the certified operation is conducting;
- (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
- (3) Be maintained for not less than 5 years beyond their creation; and
- (4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.
- (c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

Issues: - There is no status of organic on the BL loading documents and invoices of last shipment (last transaction number is TK.14.3141-013-C)

Inspector Name and signature		e (b) (6), (b) (7)(C)	Operator nam	e and signature	Alexey Khackovskiy
		Corrective A	Action Plan by Op	perator	
					
Target date	14.11.2016	Operator name and	Alexey	Actual Comple	tion
_		signature	Khackovskiy	date	
	Verific	ation of Operator's corr	ective action and	l implementation by	у ЕТКО
Accepted:	YES NO	Date		ETKO approval	

3141D-01 Ekolium

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	3/3

Explanations

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

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
--------------------	-------------------------	------------------------

Subject of nonconformity	Labelling		Std or r	•	r. IACB7.5.2,	NCR No	2016.2
Inspection Date		07.10.2016					
Date of Notification		14.10.2016			Due Date		14.11.2016
	Major N	/12-9.2				Minor	
Factors causing risk on	the proc	luct		Factors (causing no risk o	n the con	dition of the product.
Use of inputs which are	e not allo	wed by the regulations		Product	tion process p	lan partly	y implemented.
Non-Organic product s	ales as o	rganic.					
Requirements of regul	ation or	standard not applied					
Frequent minor non-co	onformiti	es on the same require	ment				
of regulation.							
Customer complaints r	ot hand	led, failure on taking rei	medial				
actions, or complaints a	and actio	n records not available.					
Misuse of the licenses	and certi	ficates					
Production process pla	n not im	plemented.					·

Description of Nonconformity by Inspector

§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

- (a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:
- (1) The name and contact information of the certifying agent which certified the handler which assembled the final product;
- $\begin{tabular}{ll} \end{tabular} \begin{tabular}{ll} \end{tabular} \beg$
- (3) Special handling instructions needed to maintain the organic integrity of the product;
- (4) The USDA seal;
- (5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.
- (b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.

Issues: - 205.102- The last transaction (TK.14.3141-013-C), Ekolium did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number)

Inspector Name and signature (b) (6)		(b) (6), (b) (7)(C)	Operator nan	ne and signature	Alexey Khackovskiy
		Corrective .	Action Plan by O	perator	
Target date	14.11.2016	Operator name and signature	Alexey Khackovskiy	Actual Completion date	
	Verific	ation of Operator's corr	ective action an	d implementation by ETK	0
Accepted:	YES NO	Date		ETKO approval	

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notification of Resolution of Non-Compliances_ Ekolium 3141D-01

Date: Wednesday, January 18, 2017 10:30:46 AM

Attachments: <u>image001.jpg</u>

image001.jpg 3141D-01 Ekolium - NRONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Ekolium 3141D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notification of Non-Compliances_ Ekolium 3141D-01

Date: Monday, October 17, 2016 4:05:31 AM

Attachments: <u>image001.jpg</u>

image001.jpg 3141D-01 Ekolium - GP 18 F 10 Notification of Noncompliance NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Ekolium 3141D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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3216F-01 Helianthus.Rev1

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
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Dear Madam / Sir: Iliin Dmitriy Ivanovich Date: 30.08.2016

On the dates (22.08.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a follow up inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **22.08.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.09.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number: 3216F-01-2016.ac

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance 3216F-01 Helianthus.Rev1

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Non-comp	liances	:										
Operator unit	no.	32	216F-	01		Unit	name	"Heli	anthus" Llc			
Location - Add	ress		A Kir 1220	ov str.,	Pereshcl	hepin	o city, Nov	omosk	ovsk distr.,Dn	ipropet	rovsk reg., Ukraine	
Initial Inspecti	Initial Inspection Surveillance Inspection					on 🛚						
Subject of nonconformity	y	Crop	op rotation (iviz)					d or reg. Art. nr. COR 5.4.2, OP 205.203b IACB 6.4.3.2				
Inspection Da	te			2.08.20								
Date of Notifi	cation		3	0.08.20	16				Due Date		30.09.2016	
		☐ Ma	ajor							Minor		
☐ Factors cau	ısing risk	on the	prod	duct					ausing no risk	on the o	condition of the	
☐ Use of inpure upper u	ıts which	are no	ot allo	owed by	the		☐ Pro	oductio	n process plar	partly i	mplemented.	
☐ Non-Organ	ic produc	t sales	s as o	rganic.								
☐ Requireme	nts of reg	ulatio	n or	standar	d not ap	plied						
☐ Frequent m			ormiti	ies on th	ne same							
requirement of												
☐ Customer of												
remedial actio	ons, or co	mplaiı	nts ar	nd actio	n record	s not						
available.												
☐ Misuse of t												
☐ Production	process	olan n	ot im	plemen	ted.							
				Desc	ription o	of No	nconformi	y by In	spector			
§205.203 Soil	fertility a	and cr	op nu	ıtrient n	nanagen	nent į	oractice sta	ndard.				
(a) The produc					_				ces that maint	ain or ir	nprove the physical,	
(b) The product plant and anim		_	ge cro	p nutrie	ents and	soil f	ertility thro	ough ro	tations, cover	crops, a	and the application of	
Issue: Crop rot	tation is r	ot inc	lude	legumi	nous cro	ps, g	reen manu	re or o	ther crops.			
Inspector Nam					, (b) (7)(0				nd signature		Iliin Dmitriy Ivanovich	
					Correctiv	re Art	ion Plan h	v Opera	ator		Ivanovicii	
Corrective Action Plan by Operator Crop rotation for the next agriculture season will be developed, including green manure into the structure of arable fields.												
Target date	30.09.20	016		rator na ature	ame and		Iliin Dmitri Ivanovich	y Act	tual Completio	on		
	V	erifica			ator's co	orrec	tive action	and im	plementation	by ETK	0	
Accepted:	Accepted: YES NO Date ETKO approval											
Explanations	·		<u> </u>	1								
•												

Notification of Noncompliance 3216F-01 Helianthus.Rev1

Nr	GP 18 F 10
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Operator unit no.	3216	F-01	Unit i	name	me "Helianthus" Llc				
Location - Address		1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220							
Initial Inspection	•	Surveillance Ins	pectio	on 🛚				.2016.ac	
		1							
Subject of nonconformity	Risk of	contamination (N	V12)	205.103a,b	d or reg. Art. nr. NOP 95.103a,b,c, 205.201.5.			2016.2	
Inspection Date	I	22.08.2016		IACB 6.3.1.	II, COR	5.1.5			
Date of Notification		30.08.2016				Due Date		30.09.2016	
	 ☑ Majo						Minor	30.03.2010	
				☐ Fact				ondition of the	
☐ Use of inputs which a regulations.	re not a	allowed by the		☐ Prod	duction	process plan	partly i	mplemented.	
☐ Non-Organic product	sales as	s organic.							
☐ Requirements of regu			pplied						
☐ Frequent minor non-crequirement of regulation		nities on the same	9						
☐ Customer complaints remedial actions, or com			_						
available.									
☐ Misuse of the licenses	and ce	ertificates							
☐ Production process pl	an not	implemented.							
		Description	of No	nconformity	by Ins	pector			
§205.201 Organic producti	on and l	handling system pla	an.						
(5) A description of the manager operation and to prevent contact information deemed necessary	t of organ	nic production and har	ndling of	perations and pr	oducts w	vith prohibited su			
§205.103 Recordkeeping b	y certific	ed operations.							
§205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:									
(4) Be sufficient to demonstrate	complian	nce with the Act and th	e regula	itions in this par	t.				
(c) The certified operation must the Secretary, the applicable Sta					_	normal business h	ours by a	uthorized representatives of	
Issue: Harvested BZ Product	ts tracea	ability not in place,	includi	ng indications	in reco	rds of agronor	nist book	and storage records	
Issue: Evidence of payment	for the	rent to the land ow	ners, a	s they receive	produc	cts from Helian	thus ma	nagement not provided.	
Inspector Name and sign	ature	(b) (6), (b) (7)	(C)	Operator na	me and	d signature		Iliin Dmitriy Ivanovich	
		Correcti	ve Act	ion Plan by	Operat	tor	<u>.</u>		
We use system when we cut crop around the fields before the main harvest and then put the crops (ВZсгорзобкосы) to separate storage (or open place). We use the ВZсгорз (обкосы) for feed of own animal farm.									
Incoming of the BZcrops for the rent to land own			ge regi	ster book a	nd in ag	gronomist red	cords. E	vidence of payment	
Target date 30.09.201	<u> </u>	perator name and		Iliin Dmitriy Ivanovich	Actu	ial Completio	n		
Verification of Operator's corrective action and implementation by ETKO									
Accepted: YES	№ Г	Date			ЕТК	(O approval			
Explanations									

Notification of Noncompliance 3216F-01 Helianthus.Rev1

Nr	GP 18 F 10
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Operator unit no.	3210	F-01 Unit	name	"Helia	nthus" Llc		
Location - Address 1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220							
Initial Inspection		Surveillance Inspection	n 🗵	⊠ Report no 321			.2016.ac
Subject of nonconformity	Risk of	contamination (M2)	_	d or reg. Art. nr. NOP, IACB 2a, COR 1.2b			2016.3
Inspection Date		22.08.2016					
Date of Notification		30.08.2016			Due Date		30.09.2016
	☐ Majo	or			⊠ I	Vinor	
☐ Factors causing risk	on the p	roduct			using no risk o	n the co	ndition of the
Use of inputs which regulations.	are not	allowed by the	☐ Proc	luction	process plan	partly in	nplemented.
☐ Non-Organic produ	ct sales a	s organic.					
		or standard not applied					
☐ Frequent minor no	_						
requirement of regula		inities on the same					
		ndled, failure on taking					
		and action records not					
available.	Jiipiaiiits	and action records not					
☐ Misuse of the licen	ses and co	ertificates					
☐ Production process	pian not	impiementea.					
		Description of No	nconformity	by Ins	pector		
Organic production. A	producti	on system that is mana	ged in accor	dance	with the Act	and regu	lations in this part to
respond to site-specif	c condition	ons by integrating cultu	ral, biologica	al, and	mechanical p	oractices	that foster cycling of
resources, promote ed	ological l	balance, and conserve b	iodiversity.				
Inches Bundaness							
issue: Producers mak	e a conse	rvation and develop pla	in of the bio	aiversi	ity in the farn	n.	
							1
Inspector Name and s	ignature	(b) (6), (b) (7)(C)	Operator na	perator name and signature			Iliin Dmitriy Ivanovich
		Corrective Act	ion Plan by	Operat	tor		
				орс. а.			
We will prepare and p	rovide pi	an of the biodiversity in	the farm.				
Target date 30.09.2	016 01	perator name and	Iliin Dmitriy		ual Carrielati	un alekt	
Target date 30.09.2	OTP SIÉ	gnature	Ivanovich	Acti	ual Completic	on date	
,	/erificatio	on of Operator's correct	ive action a	nd imp	lementation	by ETKO	
Accepted: YES	NO [Date		ET	TKO approval		
Explanations							
,							

3216F-03 Zhytnitsa.Rev1

Nr	GP 18 F 10
Date	15.07.2015
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Date: 30.08.2016

Dear Madam / Sir: Zadorozhniy Vitaliy Mikhaylovich

On the dates (23.08.2016) ETKO Inspector (b) (6), (b) (7)(C)) realized a follow up inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **23.08.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.09.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number: 3216F-03-2016.ac

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1

Nr	GP 18 F 10
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Non-compliances:

Operator unit	no.	3216F	:-03	Unit r	name	Zhytni	itsa		
Location - Add	lress	1-A, Tsentralna str., Karpivka vill., Shyrokivskiy distr., Dnipropetrovsk reg., Ukraine 53742							
Initial Inspecti	ion		Surveillance Ins	spectio	n 🛛		Report no 3	216F-03	3.2016.ac
		•							
Subject of		Crop rot	ation (M1)		_		. COR 5.4.2,	NCR N	o 2016.1
nonconformit					NOP 205.2	03b IA	CB 6.4.3.2		
Inspection Da			23.08.2016				Dua Data		20.00.2016
Date of Notifi]Major	30.08.2016				Due Date	Minor	30.09.2016
☐ Factors cau					⊠ Fact				condition of the
☐ Use of inpuregulations.	uts which a	re not al	lowed by the				process plan	partly i	mplemented.
☐ Non-Organ	ic product	sales as	organic.						
			r standard not a						
			ties on the same	e					
requirement of			dled, failure on t	talina					
	•		and action recor	_					
available.) ii j	pianies	ina action recor	us not					
☐ Misuse of t	the licenses	and cer	tificates						
☐ Production	process pl	an not ir	mplemented.						
			•		•				
			Description	of Nor	nconformity	by Ins	pector		
§205.203 Soi	l fertility an	d crop n	nutrient manage	ment p	ractice star	ndard.			
			implement tilla				es that maint	ain or in	nprove the physical,
(b) The produc	cer must m	anage cr					ations, cover	crops, a	nd the application of
plant and anin							h		
issue: Crop ro	tation is no	t includ	e leguminous cr	rops, gr	een manur	e or oti	ner crops.		
Inspector Nan	ne and sign	ature	(b) (6), (b) (7)		Operator na				Zadorozhniy Vitaliy Mikhaylovich
			Correct	ive Act	ion Plan by	Operat	tor		
Crop rotation fields.	for the nex	t agricul	lture season wil	ll be de	veloped, in	cluding	g green manu	re into	the structure of arable
Target date	30.09.201	6 '	erator name an nature	adorozhniy /italiy ⁄likhaylovic	aliy date		on		
	Vei	ification	of Operator's	correct	ive action a	nd imp	lementation	by ETK	0
Accepted:	YES 🗌	ΝО □	Date			ETH	(O approval		
Explanations									

Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1

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		1									
•		F-03 Unit nar				7					
Location - Add	Location - Address 1-A, Tsentralna str., Karpivka vill., Shyrokivskiy distr., Dnipropetrovsk reg., Ukraine 53742								ovsk reg., Ukraine		
Initial Inspection Surveillance Inspection						🔽		Damant na 3	2465.00	2 2016	
			Surveil	iance insp	ectio	on ⊠		Report no 3	216F-U:	3.2016.ac	
Cubinat of	R	Risk of	contami	nation (M	12)	Std or reg.	d or reg. Art. nr. NOP NCR No 2016.2				
Subject of			Contain		-,	205.103a,k	,c, 20!	5.201.5.	14CK 140 2010.2		
						IACB 6.3.1	ii, COF	R 5.1.5			
Inspection Date 23.08.2016											
Date of Notifi	cation		30.08.2	016				Due Date		30.09.2016	
☐ Factors causing risk on the product							Factors causing no risk on the condition of the product.				
☐ Use of inpu	ıts which ar	e not a	allowed b	y the			J			ann I am am ta d	
regulations.						☐ Pro	uctioi	n process plan	partiy i	implemented.	
☐ Non-Organ	□ Non-Organic product sales as organic.										
☐ Requireme	nts of regul	ation	or standa	rd not ap	plied						
☐ Requirements of regulation or standard not applied ☐ Frequent minor non-conformities on the same											
requirement of	of regulation	n.									
☐ Customer of	complaints i	not ha	ndled, fa	ilure on ta	king						
remedial action	ons, or comp	plaints	and acti	on record	s not						
available.											
☐ Misuse of t	he licenses	and co	ertificate	S							
☐ Production	process pla	an not	impleme	ented.							
			Des	scription c	of No	nconformity	by Ins	spector			
§205.201 Orga	nic productio	on and	handling	system plai	n.						
(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations											
					ic com	Sharice with the	тевини	10113			
§205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:											
(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.											
(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.											
Issue: Harvestee	d BZ Products	s trace	ability not	in place, ir	ncludi	ng indication	s in rec	ords of agronom	nist boo	k and storage records	
Issue: Evidence of payment for the rent to the land owners, as they receive products from Zhytnitsa management not provided.											
						Operator na	erator name and signature			Zadorozhniy Vitaliy Mikhaylovich	
			I	Correctiv	re Act	ion Plan by	Opera	tor			
We use system	n when we	cut cr	on aroun			-			out the	crops (BZcrops-	
										selling or for rental	
payment. Incoming of the BZcrops will be marked in storage register book and in agronomist records. Evidence of payment for the rent to land owners will be provided.											
Target date	30.09.201	6 0	Operator name and			Zadorozhniy /italiy Mikhaylovic	Act	ual Completio e	n		
	Ver	ificatio	on of Ope	erator's co	orrect	ive action a	nd im	plementation	by ETK	0	
Accented:					T						
Accepted: YES NO Date ETKO approval											

Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1

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Date	15.07.2015
Rev	00
Page	4/4

Operator unit	no.	3210	3216F-03 Unit name Zhytnitsa							
Location - Address 1-A, Tsentralna str., Karpivka vill., Shyrokivskiy distr., Dnipropetrovsk reg., Ukrain 53742						sk reg., Ukraine				
Initial Inspect	ion		Surveillance Inspect		⊠ Report no 321			16F-03.2016.ac		
Subject of nonconformit	ty	Risk of	contamination (M2)	d or reg. Art. nr. <mark>2a, COR 1.2b</mark>		nr. NOP, IACB	NCR No	2016.3		
Inspection Date			23.08.2016							
Date of Notification			30.08.2016		Due Date 30.09.2016				30.09.2016	
		☐ Majo	or							
☐ Factors ca	using risk (on the p	roduct		☐ Factors causing no risk on the condition of the product.					
☐ Use of inp	uts which	are not	allowed by the		☐ Production process plan partly implemented.					
regulations.						iuctio	in process plan	partiy iii	ipiementeu.	
☐ Non-Organ	nic produc	t sales a	s organic.							
☐ Requireme	ents of reg	ulation	or standard not applie	d						
☐ Frequent r	minor non-	-conforr	nities on the same							
requirement of regulation.										
☐ Customer	Customer complaints not handled, failure on taking									
remedial acti	remedial actions, or complaints and action records not									
available.										
☐ Misuse of	ertificates									
☐ Production	n process p	lan not	implemented.							
			Description of N	onco	onformity	by In	spector			
Organic produ	uction. A p	roducti	on system that is man	age	d in accor	dance	e with the Act a	and regu	lations in this part to	
			ons by integrating cult							
resources, pro	omote eco	logical l	balance, and conserve	bio	diversity.		-			
Issuer Brodu	ore make	2 60060	mustion and dayslan n	lan i	of the bie	divor	city in the form			
issue. Produc	lers make	a conse	rvation and develop p	Idii	or the bio	uiveis	sity in the fam	١.		
Inspector Nar	ne and sig	nature	(b) (6), (b) (7)(C)	Ор	erator name and signature				Zadorozhniy Vitaliy Mikhaylovich	
			Corrective A	ctio	n Plan by	Opera	ator			
We will prepa	re and pr	ovide pl	an of the biodiversity	in th	ne farm.					
те иш ргере	c and pr	oriac pi	un or the bloarerony							
	1	- 1								
		Or	Operator name and signature		dorozhniy					
Target date	30.09.201	16 '			aliy		Actual Completion date			
		5.6			khaylovic	haylovich				
Verification of Operator's corrective action and implementation by ETKO										
Accepted: YES NO Date ETKO approval										
Explanations			•			1	• •	•		

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Сс: Юлия Логвин

Subject: Notification of Non-Compliances_ Helliantus 3216F-01 and Zhytnitsa 3216F-03

Date: Tuesday, August 30, 2016 5:19:09 AM

Attachments: <u>image001.jpg</u>

3216F-01 Helianthus - GP 18 F 10 Notification of Noncompliance NONC.pdf 3216F-03 Zhytnitsa - GP 18 F 10 Notification of Noncompliance NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Heliantus 3216F-01 and Zhytnitsa 3216F-03 which are the farms of Sayvo 3216D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

Notification of Noncompliance

3219F-01 Manna CEA

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Dear Sir: Shin Dongyeop Date: 30.06.2016

On the dates (11.04.2016) ETKO Inspector (b) (6), (b) (7)(C) realized an initial inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **11.04.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

• Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.07.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

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Noncompliances:

		16.1					11.04.2016	
Noncompliance No			Major 🖂	Minor	Inspectio	n		
•					Date			
		30.06.20	016				30.07.2016	
Date of Notification					Due Date	,		
Noncompliance :	oncompliance :							
•	205.201 Organic production and handling system plan.							
a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: 5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and								
§205.272 Commingling	and contac	t with pro	hibited substance	prevention pract	ice standard			
(a) The handler of an organi and protect organic product			•	ures necessary to pre	vent the comr	mingli	ing of organic and nonorganic products	
There is no explanation Protecting measures of production activities.	_	_					protecting procedures in all the	
Inspection			205.201(a)(5)		ETKO rule	es	205.201(a)(5)	
-	NOP reg.		205.272(a)		ref.		205.272(a)	
	· ·							
Action taken								
Please identify the suppo	Please identify the supporting documents, if any:							
		Shin D	ongyeop					
Name, Surname and					Date			
Signature of Appl. Ro	esp.							
Review Date						Re	solved	
						Un	resolved	
Review Comment:	1							
REVIEW COMMENT.								
Reviewer name & sig	gnature:							

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		1						
		16.2				11.04.2016		
Noncompliance No	0		Major 🖂	Minor	Inspection	n		
					Date			
		30.06.20	016			30.07.2016		
Date of Notification	n	30.00.20	,10		Due Date	30.07.2010		
	11				Due Date			
Noncompliance :								
§205.201 Organic pro						5 404 istanding to sell label as assessed		
(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic								
	•		•	•	-	g agent. An organic system plan must meet		
•		•	•			ling system plan must include:		
· · · · · · · · · · · · · · · · · · ·	•	•				which they will be performed;		
documentation of comme		-		t, indicating its comp	osition, source,	location(s) where it will be used, and		
				ormed and maintaine	ed, including the	frequency with which they will be		
performed, to verify that	the plan is eff	ectively imple	mented;		_			
(4) A description of the re				•				
		-	· · ·	•		organic and nonorganic products on a split		
operation and to prevent (6) Additional information	_			· ·	=			
(0)			,					
There is no explanat	ion for inp	uts used as	products, org	anic certificate. r	manufacturii	ng process, product brochure etc.		
-	-		-			ecords of irrigation aren't attached.		
Sodium hypochlorite			_					
				•				
Inspection			205.201.(a)		ETKO rule	S 205.201.(a)		
criteria	NOP reg		` '		ref.			
Circeria	1101 108	. 101			101.			
Action taken								
Please identify the sup	porting docu	ments, if an	y:					
, , ,			ongyeop					
Name, Surname ar	nd		- 07 1		Date			
Signature of Appl.					Date			
Signature of Appl.	resp.				1			
Review Date						Resolved		
						Unresolved		
	•							
Review Comment:								
Poviower name 9	cianatura							
Reviewer name & s	signature:							

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Noncompliance No	1	16.3	Major 🔀	Minor	Inspection	11.04.2016		
Noncompliance 14	,		Widjoi 🖂	Willion	Date			
		30.06.2	016			30.07.2016		
Date of Notification	n				Due Date			
Noncompliance: §205.203 Soil fertility and crop nutrient management practice standard. (a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion. (b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials. (c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:								
The water analysis re	eport and c	niorine c	oncentration ar	en't indicated.				
Inspection			205.203 (c)(3)		ETKO rules	205.203 (c)(3)		
criteria	NOP reg.	ref			ref.			
Action taken								
Please identify the supp	porting docu	ments, if a	ny:					
		Shin E	Oongyeop					
Name, Surname an					Date			
Signature of Appl.	Resp.							
Review Date	Review Date				R	esolved		
Unresolved						nresolved		
Review Comment:								
Reviewer name & 9	signature:							

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Noncompliance No	0	16.4	Major 🗌	Minor 🔀	Inspection	11.04.2016			
		20.00.20	1.0		Date	20.07.2016			
Data of Natification	_	30.06.20)16		Dua Data	30.07.2016			
Date of Notificatio	n				Due Date				
·	Noncompliance:								
(a) The producer must use (1) Crop rotation and soil	§205.206 Crop pest, weed, and disease management practice standard. (a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to: (1) Crop rotation and soil and crop nutrient management practices, as provided for in §§205.203 and 205.205; (2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and								
						o suitability to site-specific conditions and			
resistance to prevalent pe (d) Disease problems may									
(1) Management practices		•	d of disease organis	sms; or					
(2) Application of nonsynt	hetic biologica	l, botanical, d	or mineral inputs.						
Pest, weed, and dise	ease manage	ement pro	gram aren't at	tached.					
	_		•		organic certif	cate, manufacturing process,			
product brochure et									
Disease managemer	nt procedure	es haven't	been indicate	d by the produce	er.				
Inspection	1	<u> </u>	205.206 (a)		ETKO rules	205.206 (a)			
Inspection criteria	NOP reg.		205.206 (a) 205.206 (d)		ref.	205.206 (d)			
Criteria	NOF Teg.	161	-00:100 (u)		161.	200.1200 (a)			
Action taken									
Please identify the sup	porting docur								
		Shin Do	ongyeop						
Name, Surname ar					Date				
Signature of Appl.	Resp.								
Review Date					F	Resolved			
					١.				
						Jnresolved			
Poviou Comments									
Review Comment:									
Reviewer name &	cianaturo:								

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		16.5				11.04.2016		
Noncompliance No)		Major 🔀	Minor 🗌	Inspection			
					Date			
		30.06.2	016			30.07.2016		
Date of Notification	1				Due Date			
Noncompliance: §205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must: (a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.								
There is no indication attached map. In the attached map The neighbors farmin	field bound	laries are	defined. But th	here is no scale a	nd specific ac			
Inspection			205.202 (c)		ETKO rules	205.202 (c)		
criteria	NOP reg.	ref			ref.			
Action taken Please identify the supporting documents, if any:								
riedee identify the supp			ongyeop					
Name, Surname an	d				Date			
Signature of Appl. F	Resp.							
Review Date					ı	Resolved		
					l	Jnresolved		
Review Comment: Reviewer name & s	ignature:							

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Noncompliance No		16.6	Major 🗌	Minor 🔀	Inspection	11.04.2016
			1,1	- 23	Date	
	3	30.06.20	016			30.07.2016
Date of Notification	า				Due Date	
agricultural products as "1 production or handling sys	er of a production 00 percent orga Stem plan that is	on or handli anic," "orga s agreed to	ing operation, exce nic," or "made with by the producer or	h organic (specified in r handler and an accr	ngredients or food edited certifying ag	01, intending to sell, label, or represent group(s))" must develop an organic ent. An organic system plan must meet system plan must meet
(1) A description of practic	es and procedu to be used as a rcial availability,	res to be position of the posi	erformed and mair n or handling input ble;	ntained, including the t, indicating its compo	frequency with wi	nich they will be performed; ation(s) where it will be used, and
railii Fioduction Kep	Joit is not ta	Kell allu	not attached y	et.		
Inspection			205.201 (a)(2)		ETKO rules	205.201 (a)(2)
criteria	NOP reg. r	ef			ref.	
Action taken Please identify the supp	porting docum	ents. if an	ıv:			
, , , , , , , , , , , , , , , , , , , ,			ongyeop			
Name, Surname an Signature of Appl. F					Date	
Review Date						esolved
					U	nresolved
Review Comment:						
Reviewer name & s	ignature:					

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Date	15.07.2015
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		16.7				11.04.2016
Noncompliance No)		Major 🔛	Minor 🔀	Inspection	
					Date	
		30.06.2	2016			30.07.2016
Date of Notification	ı				Due Date	
Noncompliance :						
§205.201 Organic prod						
						O1, intending to sell, label, or represent group(s))" must develop an organic
			•	• ,,	•	ent. An organic system plan must meet
the requirements set forth	in this section	for organ	ic production or han	dling. An organic prod	duction or handling	system plan must include:
(5) A description of the ma operation and to prevent of				·		anic and nonorganic products on a split
operation and to prevent t	ontact of orga	inic produc	ction and nandling o	perations and produc	is with prohibited s	substances; and
Farm field is isolated	from natur	al ecosy	stem and so ma	ny species are ta	ken from othe	rs. There is no explanation
regarding this matter	r.					
					T	
Inspection			205.201(a)(5)		ETKO rules	205.201(a)(5)
criteria	NOP reg.	ref			ref.	
Action taken						
Please identify the supp	orting docur	nents, if a	any:			
		Shin I	Dongyeop			
Name, Surname an	d				Date	
Signature of Appl. F	Resp.					
Review Date					Re	esolved 🗌
					Ur	nresolved 🗌
Review Comment:						
Reviewer name & s	ignature:					

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Subject: Notification of Resolution of Non-Compliances- Manna CEA 3219F-01

Date: Friday, July 01, 2016 10:34:24 AM

Attachments: <u>image001.jpg</u>

image001.jpg NONC 3219F-01 Manna CEA.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliance for MannaCea. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>
Cc: <u>ma@etko.org; info@mannacea.com</u>

Subject: Notification of Resolution of Non-Compliances- Manna CEA 3219F-01

Date: Wednesday, July 13, 2016 8:42:31 AM

Attachments: <u>image001.jpg</u>

NRONC 3219F-01 Manna CEA.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for MannaCea. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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Notification of Resolution of Noncompliance 3219F-01 Manna CEA

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Date: 12.07.2016

Dear Madam / Sir: Shin Dongyeop

On the date (11.04.2016) ETKO Inspector (b) (6), (b) (7)(C) realized an initial inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance:

NC number(s): 16.1, 16.2, 16.3, 16.4, 16.5, 16.6, 16.7 See below forms

Outstanding noncompliance : None
 None

NC number(s):

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Resolved Noncompliances:

Noncompliance No	16.1	Major Minor	Inspection Date	11.04.2016
Latine a transc	30.06.	2016	The second	30.07.2016
Date of Notification	n		Due Date	
agricultural products as "12 production or handling sy the requirements set fort! (5) A description of the moperation and to prevent \$205.272 Comminglin (a) The handler of an organ and protect organic production.	er of a production or har 1.00 percent organic," "or stem plan that is agreed in this section for organic management practices and contact of organic products and contact with prince handling operation in acts from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management products from contact with prince management prince management products from contact with prince management	Idling operation, except as exempt or ex- ganic," or "made with organic (specified to by the producer or handler and an ad- nic production or handling. An organic p d physical barriers established to preven- iction and handling operations and production and handling operations and production pra- rohibited substance prevention pra- nust implement measures necessary to pohibited substances.	d ingredients or food credited certifying agroduction or handling it commingling of orguets with prohibited actice standard. prevent the comming m contamination	gent. An organic system plan must meet g system plan must include: anic and nonorganic products on a split substances; and gling of organic and nonorganic products
Inspection		205.201(a)(5)	ETKO rules	205.201(a)(5)
criteria	NOP reg. ref	205.272(a)	ref.	205.272(a)
Protecting measur	porting documents, if	ontamination is regarded as on are attached. any: Annex 1,2 and 18, 19, 24- Pro	otecting measures 04	
Name, Surname an Signature of Appl.		(D) (U)	Date	
Review Date	11.07.2016			esolved nresolved
Review Comment: contamination are	attached.	uments are provided and th	ey are proper.	Protecting measures of

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Noncompliance No	16.2	Major Mind	or Inspec	tion	11.04.2016
			Date		
Date of Notification	30.06.	.2016	Due D	ate	30.07.2016
agricultural products as "1 production or handling systhe requirements set forth (1) A description of practic (2) A list of each substance documentation of comme (3) A description of the me performed, to verify that to (4) A description of the rec (5) A description of the me operation and to prevent (6) Additional information There is no explanat They use sodium hyp	er of a production or har 100 percent organic," "or stem plan that is agreed in this section for organices and procedures to be e to be used as a producterial availability, as application application or the plan is effectively impanagement practices and posterior of organic producted or the plan is effectively in the	ndling operation, except as ex rganic," or "made with organit to by the producer or handler nic production or handling. Ar e performed and maintained, tion or handling input, indicaticable; procedures to be performed a plemented; plemented to comply with the d physical barriers established uction and handling operation he certifying agent to evaluate as products, organic ce	c (specified ingredients rand an accredited cert organic production or including the frequency ing its composition, sound maintained, including requirements established to prevent commingling and products with procecompliance with the restriction.	or food gifying age handling with where, local gifted in \$20 g of orgathibited segulation with many curing parts recol	ich they will be performed; tion(s) where it will be used, and quency with which they will be 5.103; nic and nonorganic products on a split ubstances; and s. process, product brochure etc. rds of irrigation aren't attached
Inspection		205.201.(a)	ETKO	rules	205.201.(a)
AND ROOM AND ADDRESS OF THE PARTY OF THE PAR	NOP reg. ref		ref.		
Action taken: Inputy hypochlorite production of the production of the suppose of	it materials are pr ucts specifications porting documents, if	s are provided. any: Annex 14, 15 and 31	cedures and its r		are provided. Sodium 8- Cleaning procedures and its
Action taken: Inputypochlorite produce Please identify the supprecords, Annex 19- Social Name, Surname and	porting documents, if	s are provided. any: Annex 14, 15 and 31	cedures and its r	Annex 1	
Action taken: Inpu	porting documents, if	s are provided. any: Annex 14, 15 and 31 ecifications	cedures and its r	O4	8- Cleaning procedures and its

Notification of Resolution of Noncompliance 3219F-01 Manna CEA

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Noncompliance No)	16.3	Major 🔀	Minor 🗌	Inspection Date	11.04.2016
		30.06.2	016		Date	30.07.2016
Date of Notification	1	30.00.2	.010		Due Date	30.07.2010
Noncompliance: §205.203 Soil fertility (a) The producer must sele soil and minimize soil eros (b) The producer must mal (c) The producer must mal contamination of crops, so materials include:	and crop nut ect and implem ion. nage crop nut nage plant and oil, or water by	nent tillage rients and s I animal ma plant nutri	and cultivation praction oil fertility through terials to maintain cents, pathogenic or	rotations, cover crops or improve soil organi ganisms, heavy metal	r improve the physi s, and the application	ical, chemical, and biological condition of on of plant and animal materials. n a manner that does not contribute to ohibited substances. Animal and plant
The water analysis re	eport and ci	niorine co	oncentration ar	en't indicated.		
Inspection			205.203 (c)(3)		ETKO rules	205.203 (c)(3)
criteria	NOP reg.	ref			ref.	
	7.6.1.0					
Action taken: Wate	er report is	s provid	ed.			
Please identify the supp	orting docur	ments, if a	ny: Annex 1 and	2 - Water Analyses	5	
Name, Surname an Signature of Appl. F	d		ongyeop	(b) (6)		.07.2016
Review Date	11.07.2	2016				esolved 🗵
Review Comment:					Ur	nresolved

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Noncompliance N	0		Major 🗌	Minor 🖂	Inspection Date	11.04.2016	
Date of Notificatio		.06.201	6		Due Date	30.07.2016	
resistance to prevalent po (d) Disease problems may (1) Management practice (2) Application of nonsyn Pest, weed, and dise	e management prac and crop nutrient no o remove disease ve enhance crop healt ests, weeds, and dis o be controlled thro s which suppress the thetic biological, bo ease management	ctices to pri nanagemer ectors, week th, including eases. ugh: ne spread o etanical, or	event crop pests nt practices, as p ed seeds, and ha ng selection of pl of disease organi mineral inputs.	s, weeds, and diseas provided for in §§20 bitat for pest organ lant species and var sms; or	15.203 and 205.205 isms; and ieties with regard t		
Disease manageme	nt procedures h			d by the produc		·	
Inspection criteria	NOP reg. ref		05.206 (a) 05.206 (d)		ETKO rules ref.	205.206 (a) 205.206 (d)	
and analysis repor	t are provided porting documen ent procedures	d. Disea	se manager Annex 4-Nee	nent procedu	res are attach	ificate and Annex 4 & 5- Pes	
Name, Surname ar Signature of Appl.	nd	Shin Don	ngyeop	(b) (6)	Date	04.07.2016	
Review Date	11.07.201	6				Resolved Jnresolved	
Review Comment: Certificate and and						d. About neem oil OMI are attached.	RI

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Noncompliance No)	16.5	Major 🔀	Minor	Inspection	11.04.2016		
			- ,	- Ш	Date			
		30.06.2	016			30.07.2016		
Date of Notification	า				Due Date			
` '	om which har accordance v d substances, poundaries an	vith the prov as listed in § d buffer zor	visions of §§205.203 §205.105, applied to les such as runoff di	3 through 205.206; o it for a period of 3 ye iversions to prevent th	ears immediately po ne unintended appl	c," must: receding harvest of the crop; and ication of a prohibited substance to the		
There is no indication regarding the condition of neighboring farm as like conventional, organic and crop type in the attached map. In the attached map field boundaries are defined. But there is no scale and specific address. The neighbors farming type, paths width and scales of map have not been pointed out by the producer.								
Inspection			205.202 (c)		ETKO rules	205.202 (c)		
criteria	NOP reg.	ref			ref.			
Action taken: Deta	·				iched.			
ricase identity the supp	Joi ting docu		Oongyeop	(b) (6)	04	.07.2016		
Name, Surname an				(D)	Date			
Signature of Appl. I								
Review Date	11.07.	2016			Re	esolved 🖂		
					Ur	nresolved 🗌		
Review Comment:			_	cumstances are	attached.			
Reviewer name & s	ignature:	raun Ak	зоу					

Notification of Resolution of Noncompliance 3219F-01 Manna CEA

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Noncompliance	No 16.0		7 37 30 3	nspection Date	11.04.2016
Date of Notificat		06.2016	1	Due Date	30.07.2016
(a) The producer or ha agricultural products a production or handling the requirements set f (1) A description of pro (2) A list of each subst documentation of com	production and handle andler of a production or as "100 percent organic," g system plan that is agre forth in this section for o actices and procedures t ance to be used as a pro nomercial availability, as a	handling operation, excep "organic," or "made with eed to by the producer or h rganic production or handl to be performed and mainta duction or handling input,	organic (specified ingr handler and an accredi ling. An organic produc ained, including the fre indicating its composit	edients or food pited certifying ago ction or handling equency with wh	01, intending to sell, label, or represent group(s))" must develop an organic ent. An organic system plan must meet system plan must include: nich they will be performed; ation(s) where it will be used, and
Particular Property	1	205.201 (a)(2)	Tre	ETKO rules	205 201 (-1/2)
Inspection criteria	NOP reg. ref			ref.	205.201 (a)(2)
criteria Action taken : 'I	supporting documents		r	ref.	3.07.2016

Notification of Resolution of Noncompliance 3219F-01 Manna CEA

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
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Noncompliance		16.7	Major	Minor 🖂	Inspection Date	11.04.2016
Date of Notifica		30.06.20	16		Due Date	30.07.2016
agricultural products production or handlin the requirements set (5) A description of the operation and to preven	a production and ha andler of a productio as "100 percent orga in gystem plan that is forth in this section f he management pract went contact of organ	on or handlin inic," "organ agreed to be for organic pe tices and phe ic production	ng operation, exce nic," or "made wit by the producer or production or han nysical barriers est on and handling o	h organic (specified r handler and an ac dling. An organic pr tablished to prevent perations and prod	I ingredients or fo credited certifying roduction or hand t commingling of a ucts with prohibit	15.101, intending to sell, label, or represent od group(s))" must develop an organic gagent. An organic system plan must meet ling system plan must include: organic and nonorganic products on a split ed substances; and hers. There is no explanation
Inspection criteria	NOP reg. re		205.201(a)(5)		ETKO rule	s 205.201(a)(5)
Action taken : I					olodiversity b	y planting a variety of species
Name, Surname Signature of Ap		Shin Do	ongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.20	16				Resolved Unresolved
	-					

Notification of Resolution of Noncompliance

3080F-01 RinAgro

Nr	GP 18 F 11
Date	15.07.2015
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Date: 02.01.2016

Dear Madam / Sir: Okunenko Igor Nicolaevich

On the dates (04.08.2016) ETKO Inspector (b) (6), (b) (7) realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result	Date
20360	Soybean Plants	3080F-01 Rinagro	Field No (b) (Pyraclostrobin	0,139	None	0,01	Noncompliance	26.08.2016
20300	Sovbean	3080F-01	Field No	Pyraclostrobin	0.064	None	0.01	Noncompliance	14.10.2016
OZ140004	Plants	Rinagro	ricia No	1 yluciostroom	0,004	None	0,01	Noncompliance	14.10.2010

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **14.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **14.11.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

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

Sincerely

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 1

NC number(s): **2016.1** See below forms.

Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance

3080F-01 RinAgro

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
Page	2/3

sown)

Non-compliances	:							
Operator unit no.	3080F	-01	Unit r	name	RinAgı	ro		
Location - Address	29, As	skaniyskoy stree	et, Cha	plynka, Khe	rson re	gion, Ukraine	9	
		•		<u> </u>		<u> </u>		
Initial Inspection		Surveillance In	spectio	n		Report no 3	080-201	6.ma
[Т	
Subject of	Analyses	Std or reg		•	NCR No	2016.1		
nonconformity Inspection Date		04.08.2016		NOP 205.	105			
Date of Notification		14.10.2016				Due Date		
					14.11.2016			
				Minor				
☐ Factors causing risk on the product ☐ Factors causing no risk on the condition of the product.							ondition of the	
Use of inputs which a	re not all	owed by the re	gulatio	ns. 🗆 Pr	oductio	n process pla	n partly	mplemented.
☐ Non-Organic product								
Requirements of reg								
☐ Frequent minor non-		ties on the same	5					
requirement of regulati Customer complaints		dod failura on t	aking					
remedial actions, or cor			_					
available.	iipiaiiits a	na action recon	us not					
☐ Misuse of the license	s and cer	tificates						
☐ Production process p								
				I				
		Description	of Nor	nconformit	y by Ins	pector		
§205.105 Allowed and pro		•	-	-	_	•		_
To be sold or labeled as "10	-	_		nade with o	rganic (s _l	pecified ingred	lients or f	ood group(s))," the
product must be produced (a) Synthetic substances and in				1 or §205.603:	:			
(b) Nonsynthetic substances pro	hibited in §	205.602 or §205.604	! ;					
(c) Nonagricultural substances ι(d) Nonorganic agricultural substances							16.	
(e) Excluded methods, except f	or vaccines:	Provided, That, the	vaccines	are approved	in accord	ance with §205.6		
(f) Ionizing radiation, as describe(g) Sewage sludge.	ed in Food a	nd Drug Administrat	ion regula	ation, 21 CFR 1	179.26; an	d		
(8) sewage staage.								
Detection of chemical su					sted lab	oratory resu	Its and a	nalyses report.
Sample of soya plants w								
Distance from source of			oximat	ely 150 me	ters. so	urce of conta	aminatio	n was found – a small
conventional garden ne	ct to the i	ieid ivi <mark>e</mark> .						
Inspector Name and sign	nature	(b) (6), (b) (7)(0	C)	Operator	name a	and signature	!	Igor Okunenko
		Correct	ive Act	ion Plan by	Operat	tor		
There is no direct use of								
neighbor as the owner of								
substance for their fruit								
Thus, RinAgro and Sadel					n for nei	ignboring are	eas for th	e next years:
March2017 - soil fromMay-June 2017 - samp					m field	ncollin the n	eriod of	vegetation (depending
on the crop that will.be		marysis or young	5 ci ops	, piants no	neiu	in the p	criou oi	repetation (depending
July-September 2017 - sampling and analysis of available product from field (depending on the crop that will be								

Notification of Resolution of Noncompliance 3080F-01 RinAgro

Nr	GP 18 F 11
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Target date	14.11.2016	Operator r	ame and	Igor Okunenko)	Actual Completion date		20.12.2016	
Verification of Operator's corrective action and implementation by ETKO									
Accepted: YES NO Date 20.12.2016 ETKO approval Mustafa Akyüz									
Nra. Distance f small convention check-monitoring	Explanations: According to our inspector, explanation, sample of soya plants was taken in the middle of the field Nr. Distance from source of contamination was approximately 150 meters. Source of contamination was found – a small conventional garden next to the field Nr. We decided to transfer the whole field nr. In IC period for two years for check-monitoring to avoid all risks. The product is disqualified from organic production so, the operator sold them as conventional in this year.								

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>ma@etko.com.tr</u>; <u>trade@sadeko.org</u>; <u>Office Sadeko</u>

Subject: Notification of Resolution of Non-Compliances- RinAgro 3080F-01

Date: Wednesday, February 08, 2017 7:35:59 AM

Attachments: <u>image001.jpg</u>

3080F-01 RinAgro- Notification of Resolution of Noncompliance.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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Notification of Noncompliance

3080F-01 RinAgro

GP 18 F 10
15.07.2015
00
1/2

Date: 14.10.2016

Dear Madam / Sir: Okunenko Igor Nicolaevich

On the dates **04.08.2016** ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
OZ140004	Soybean Plants	3080F-01 Rinagro	Field No	Pyraclostrobin	0,064	None	0,01	Noncompliance

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

 Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYUZ from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Non-compliances:

Notification of Noncompliance

3080F-01 RinAgro

Nr	GP 18 F 10
Date	15.07.2015
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Page	2/2

Operator unit no.	3080F-01	Unit name	RinAgro				
Location - Address	29, Askaniyskoy stree	29, Askaniyskoy street, Chaplynka, Kherson region, Ukraine					

		1			1				
Initial Inspection	Surveillance Inspection			Report no 3080-2016.ma					
Subject of	-	la. I							
nonconformity	abject of Analyses Analyses			Std or reg. Art. nr. NOP 205.105			NCR No 2016.1		
Inspection Date		04.08.2016							
Date of Notification		14.10.2016			Due Date		14.11.2016		
	Major S	2. 7.4]Minor			
☐Factors causing risk on the product				☐ Factors causing no risk on the condition of the product.					
⊠Use of inputs which	are not a	llowed by the regulation	ns.	☐Production process plan partly implemented.					
☐ Non-Organic produc	t sales as	s organic.							
☐Requirements of reg	ulation o	r standard not applied							
☐Frequent minor non-	-conform	ities on the same							
requirement of regulation.									
☐Customer complaints not handled, failure on taking									
remedial actions, or complaints and action records not									
available.									
☐Misuse of the license	es and ce	rtificates							
☐Production process p	olan not i	mplemented.							

Description of Nonconformity by Inspector

§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.

To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:

- (a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;
- (b) Nonsynthetic substances prohibited in §205.602 or §205.604;
- (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;
- (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;
- (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);
- (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and
- (g) Sewage sludge.

Issues:

Explanations

Detection of chemical substances in organic products. See above listed laboratory results and analyses report. Sample of soya plants was taken in the middle of the field Nr

Distance from source of contamination was approximately 150 meters. source of contamination was found – a small conventional garden next to the field Nr

Inspector Name and signature Operator name and signature **Igor Okunenko** (b) (6), (b) (7)(C) **Corrective Action Plan by Operator** Operator name and **Actual Completion Target date** 14.11.2016 Igor Okunenko signature date Verification of Operator's corrective action and implementation by ETKO YES NO Date ETKO approval Accepted:

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>trade@sadeko.org</u>

Subject: Notification of Non-Compliances_ RinAgro 3080F-01

Date: Tuesday, December 13, 2016 10:43:50 AM

Attachments: <u>image001.jpg</u>

image001.jpg 3080F-01 RinAgro- Notification of Noncompliance.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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Notification of Resolution of Noncompliance

3080F-01 RinAgro

Nr	GP 18 F 11
Date	15.07.2015
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Date: 02.01.2017

Dear Madam / Sir: Okunenko Igor Nicolaevich

On the dates (04.08.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result	Date
20360	Soybean Plants	3080F-01	Field No (b) (4	Pyraclostrobin	0,139	None	0,01	Noncompliance	26.08.2016
20300	Soybean	Rinagro 3080F-01	Field No	Pyraclostrobin	0,064	None	0,01	Noncompliance	14.10.2016
OZ140004	Plants	Rinagro						,	

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **14.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **14.11.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

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

Sincerely

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 1

NC number(s): 2016.1 See below forms.

Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance 3080F-01 RinAgro

Nr	GP 18 F 11
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Non-compliances	:							
Operator unit no.	3080	0F-01	Unit ı	name	RinAgı	ro		
Location - Address		Askaniyskoy stree						
Location - Address	23,1	ASKAIIIYSKOY SLICE	t, Ciia	ріупка, кпе	1301116	giori, Okraine	-	
Initial Inspection		Surveillance Ins	spectio	on		Report no 3	080-201	6.ma
Subject of	Analys	es	_	or reg. Art. nr.			2016.1	
nonconformity		04.00.2046		NOP 205.	OP 205.105			
Inspection Date Date of Notification		04.08.2016 14.10.2016				Due Dete		
				<u> </u>		Due Date		14.11.2016
				Minor				
☐ Factors causing risk of	on the pi	roduct		□ Fa produ		iusing no risk	on the c	ondition of the
□ Use of inputs which a	re not a	llowed by the reg	gulatio	ns. Pr	oductio	n process pla	n partly	implemented.
☐ Non-Organic product	t sales as	s organic.						
☐ Requirements of reg	ulation o	or standard not a	pplied					
☐ Frequent minor non-	conforn	nities on the same	j					
requirement of regulati								
☐ Customer complaints			_					
remedial actions, or cor	nplaints	and action record	ds not					
available.								
☐ Misuse of the license								
☐ Production process p	lan not	implemented.						
			٠					
SOF ADE Allermed and are	م لم معنانا	Description			• •	•	بالمسمالي	
§205.105 Allowed and pro To be sold or labeled as "10								
product must be produced					B (9)	, , , , , , , , , , , , , , , , , , ,		5 5 4 B. 5 4 P(5/)/ 15
(a) Synthetic substances and in	-			1 or §205.603;				
(b) Nonsynthetic substances pro(c) Nonagricultural substances u				as otherwise pi	rovided in	§205.605:		
(d) Nonorganic agricultural subs							6;	
(e) Excluded methods, except f							600(a);	
(f) Ionizing radiation, as describe(g) Sewage sludge.	ea in Food	and Drug Administration	on regui	ation, 21 CFR 1	.79.26; an	a		
Detection of chemical su					sted lab	oratory resu	lts and a	nalyses report.
Sample of soya plants w					_			
Distance from source of			oximat	tely 150 me	ters. so	ource of conta	ıminatio	n was found – a small
conventional garden ner	kt to the	field IV						
Inchestor Name and sign	2011110	(1) (0) (1) (7)(6		Operator	namaa	and signature		Igor Okunonko
Inspector Name and sign	iature	(b) (6), (b) (7)(C				ind signature		Igor Okunenko
				ion Plan by	•			
There is no direct use of								
neighbor as the owner of								
substance for their fruit								
Thus, RinAgro and Sadel - March2017 - soil from					ı tor ne	ignboring are	as for tr	ie next years:
- May-June 2017 - samp					m field	no ^{0) t} n the n	eriod of	vegetation (depending
on the crop that will.be		analysis of young	5 crops	, piants mu	iii iieiu	iio mii tile pe	eriou oi	vegetation (depending
-		g and analysis of	availal	ble product	from fi	eld #	nding on	the crop that will be
July-September 2017 - sampling and analysis of available product from field # depending on the crop that will be								

Notification of Resolution of Noncompliance 3080F-01 RinAgro

Nr	GP 18 F 11
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Target date	14.11.2016	Operator name and signature		Igor Okunenko		Actual Completion date		20.12.2016
Verification of Operator's corrective action and implementation by ETKO								
Accepted: YES NO Date 02.01.2017 ETKO approval Mustafa Akyüz								
Nru. Distance small conventi	from source of ional garden ne itoring to avoid	contamination	on was appr d N ¹⁰¹ 4We d	oximately 150 n ecided to transf	nete er tl	ers. Source of co	ntamina nr. <mark>"</mark> in IC	e middle of the field tion was found – a period for two years operator sold them

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>ma@etko.com.tr</u>; <u>trade@sadeko.org</u>; <u>Office Sadeko</u>

Subject: RE: Notification of Resolution of Non-Compliances- RinAgro 3080F-01

Date: Wednesday, February 08, 2017 7:51:32 AM

Attachments: <u>image001.jpg</u>

3080F-01 RinAgro- Notification of Resolution of Noncompliance.pdf

Dear Sirs.

Please refer to the attached NRONC for RinAgro 3080F-01 which is corrected and ignore the previously sent one.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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From: Ceren BAYAZIT [mailto:cb@etko.com.tr] Sent: Wednesday, February 8, 2017 3:36 PM

To: 'AMS - NOPACAAdverseActions' (NOPACAAdverseActions@ams.usda.gov)
Cc: ma@etko.com.tr; trade@sadeko.org; Office Sadeko (office@sadeko.org)
Subject: Notification of Resolution of Non-Compliances- RinAgro 3080F-01

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

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From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>; <u>Юлия Логвин</u>

Cc: <u>ma@etko.org</u>; <u>fa@etko.org</u>

Subject: Notification of Resolution of Non-Compliances- Sayvo 3216

Date: Monday, June 27, 2016 10:09:56 AM

Attachments: image001.jpg

NRONC 3216F-01 Helliantus.pdf NRONC 3216F-02 Dovira.pdf NRONC 3216F-03 Zhytnitsa.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Sayvo 3216. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

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Notification of Resolution of Noncompliance

3216F-01 Helliantus LLC

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
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Dear Madam / Sir: Ilin Ivan Alekseevich Date: 23.06.2016

On the date (11.12.2015) ETKO Inspector(b) (6), (b) (7)(C) realized an initial inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely

Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 3

NC number(s): **15.1, 15.2, 15.3 See below forms**

• Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
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Resolved Noncompliances:

Noncompliance No)	1	Major 🔀	Minor	Inspection Date	11.12.2015	
	23.06.2016					02.05.2016	
Date of Notification	1				Due Date		
Noncompliance: §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 There is risks of contamination. There is a lot of dust in storage N1 were store corn (300t). Also there is red color							
stain. Director says that stain made 3 years ago and will be cleaned. They have no records about storage cleaning.							
Inspection			205.272a		ETKO rules	834-Article 12.1	
criteria	NOP reg. ref				ref.	IACB 6.5.3, 11.1	
Action taken: Storages were swept, stains were cleaned. Storage cleansing register was unimplemented. Please identify the supporting documents, if any:							
riease identity the supp	or ting docu		an Alekseevich		11	.04.2016	
Name, Surname an Signature of Appl. F					Date		
Review Date	30.04.2	2016				esolved	
Review Comment: Storage cleaning register is presented. (last cleaning is done 25.04.2016 by (b) (4) .) Reviewer name & signature: Fatih Aksoy							
neviewer name & signature. Faun Arsoy							

Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC

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						44.40.0045	
		2		5		11.12.2015	
Noncompliance N	0		Major 🔛	Minor 🔀	Inspection		
					Date		
		23.06.20	016			02.05.2016	
Date of Notificatio	n				Due Date		
Noncompliance :					I.	1	
§205.103 Recordkeepi	ng by certific	ed operatio	ns.				
				e production, harve	esting, and han	dling of agricultural products that are	
						made with organic (specified	
ingredients or food gro	oup(s))."						
(b) Such records must:							
(1) Be adapted to the p				_			
(2) Fully disclose all act	ivities and tr	ansactions (of the certified o	peration in sufficie	nt detail as to b	e readily understood and audited;.	
1 2 OCD Annov Form	Droduction	. Donort "	Earm Blot Inve	ntory proposati	ion material a	nd Pest Management" were not	
		i keport,	railii Piot ilive	ilitory, propagati	on material a	nd Pest Management Were not	
completed for all se	ctions.						
1		1.	205 202 (-) 20	F 20F	ETI(O . I	024 4 4 5 1460 44 42	
Inspection			205.203 (c), 20	5.205	ETKO rules	834-Art.4, 5, IACB 4.1, 4.2,	
criteria	NOP reg.	ret			ref.	6.4.3	
A .:			· · · ·			5.1 OCP, 1.3 OCP	
Action taken: All	sections of	tne Ann	ex were finish	iea.			
Please identify the sup	norting docu	monts if an	w OCP Anne	v Farm Producti	ion Report		
riease identity the sup	porting docu		n Alekseevich	K T d T T T T T T T T T T T T T T T T T		7.04.2016	
Name Communication		IIII IVa	II Alekseevicii			17.04.2016	
Name, Surname ar					Date		
Signature of Appl.							
	30.04.2	2016					
Review Date					F	Resolved 🔀	
						_	
					l I	Jnresolved 🗍	
						Jili eserveu	
Davison Camana	C	-l C A					
Review Comment: Confirmed. See Annex.							
Reviewer name &	Reviewer name & signature: Fatih Aksoy						
keviewer name α signature: Fatin Aksoy							

Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC

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		3				11.12.2015	
Noncompliance N	0		Major 🗌	Minor 🔀	Inspection		
					Date		
		23.06.20	16			02.05.2016	
Date of Notification					Due Date		
§205.202 Land requirem	ents.						
Any field or farm parcel fr		-			resented as "orga	anic," must:	
(a) Have been managed in		•		•	ears immediately	preceding harvest of the crop; and	
1					-	oplication of a prohibited substance to the	
crop or contact with a pro	hibited substa	ince applied t	o adjoining land th	nat is not under orgar	nic management.		
14.1 OCP They have	-				ed well.		
14.2 OCP Buffer zon				•			
14.3 OCP Director ki	nows neign			cription was not	1	1	
Inspection		_	205.202		ETKO rules	The state of the s	
criteria	NOP reg.	ref			ref.	14.1-14.3 OCP	
Action taken : The	field men	oo nodu		indication of th		and huffer range	
Action taken: The	пеіа тар	was reur	awn win the	indication of th	ie neignbors	and butter zones.	
Please identify the sup	porting docu	ments, if an	y:				
		Ilin Ivai	n Alekseevich			04.04.2016	
Name, Surname ar	nd				Date		
Signature of Appl.	Resp.						
	30.04.2	2016					
Review Date						Resolved 🔀	
						Unresolved 🗍	
Officsolved							
Pavious Comment: Neighbors of form are indicated on the man. Bidgs buffer zones are indicated on the man							
Review Comment: Neighbors of farm are indicated on the map. Risky buffer zones are indicated on the map							
by red color. See annex- map.							
Reviewer name & signature: Fatih Aksoy							

Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC

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Noncompliance No	4				11.12.2015				
		Major 🗌	Minor 🖂	Inspection					
•		,		Date					
	23.06.2	2016		Date	02.05.2016				
Date of Notification	23.00.2	.010		Due Date	02.03.2010				
	§205.204 Seeds and planting stock practice standard.								
(a) The producer must use orga	•		nd planting stock: Exc	cept, That,					
(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;									
variety is not commercially ava	lable: Except, That,	organically produced	d seed must be used	for the productio	n of edible sprouts;				
16.2- 16.3 OCP Propagat	ion Material Ap	proval forms an	d proves about t	he absence of	organic seeds in local market not				
provided.					_				
16.4 OCP Vendor Declara	ation is not pres	ent.							
16.5 OCP Annex Farm Pr	oduction Report	t, "Propagation	Material" invoice	es and certific	ates for all used seeds not				
provided.									
Inspection		§205.202		ETKO rules					
criteria NO	P reg. ref			ref.	14.1-14.3 OCP				
					out absence of organic seeds is				
					nt, because in spring 2015 the				
farm was not under or	ganic regulation	ons and didn't	get everything	•					
Please identify the supporti	ng documents, if a	ny: Prop. Mate	rial Approval F	orm, Letter :	about seeds				
Please identify the supporti		iny: Prop. Mate an Alekseevich	rial Approval F						
			rial Approval F	(about seeds 17.04.2016				
Name, Surname and	Ilin Iv		rial Approval F						
Name, Surname and Signature of Appl. Resp	Ilin Iv		rial Approval F	(
Name, Surname and Signature of Appl. Resp	Ilin Iv		rial Approval F	Date	07.04.2016				
Name, Surname and Signature of Appl. Resp	Ilin Iv		rial Approval F	Date					
Name, Surname and Signature of Appl. Resp	Ilin Iv		rial Approval F	Date	27.04.2016 Resolved				
Name, Surname and Signature of Appl. Resp	Ilin Iv		rial Approval F	Date	07.04.2016				
Name, Surname and Signature of Appl. Resp Review Date	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016	an Alekseevich		Date	27.04.2016 Resolved				
Name, Surname and Signature of Appl. Resp Review Date	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016	an Alekseevich		Date	Resolved Unresolved				
Name, Surname and Signature of Appl. Response Review Date Review Comment: Let	Ilin Iv 30.04.2016 ters, forms and	d certificates, i		Date	Resolved Unresolved				

Notification of Resolution of Noncompliance

3216F-02 Dovira

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Dear Madam / Sir: Struk Victor Ivanovych Date: 23.06.2016

On the date (11.12.2015) ETKO Inspector (b) (6), (b) (7)(C) realized an initial inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 5

NC number(s): 15.1, 15.2, 15.3, 15.4, 15.5 See below forms

Outstanding noncompliance : None

NC number(s):

Notification of Resolution of Noncompliance 3216F-02 Dovira

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Resolved Noncompliances:

Noncompliance No)	1	Major 🔀	Minör 🗌	Inspection Date	11.12.2015
		23.06.2016				02.05.2016
Date of Notification	า	Due Da			Due Date	
(a) The handler of an organ protect organic products fr (b) The following are prob D of this part: (1) Packaging materials, at (2) The use or reuse of any organically produced prod	Noncompliance: §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart					
11.1 (OCP) There is t	he risks of	contamina	ation.			
				plained that they	used to treat	seeds in the past. No treatment
was done for 2015 c	rops becau	se produc	er decided to s	tart with organic	production. S	ee picture.
Inspection			205.272		ETKO rules	834-Article 12.1
criteria	NOP reg.	ref			ref.	IACB 6.5.3, 11.1 OCP, 11.3 OCP, 11.4 OCP
						0CP, 11.4 0CP
	Action taken: Bunkers of sowing machines were washed. Please identify the supporting documents, if any: 3216F-02 Dovira - Register of cleaning					
			/ictor Ivanovyo			5.04.2016
Name, Surname an					Date	
Signature of Appl. I						
Review Date 30.04.2016 Resolved			esolved 🔀			
			U	nresolved		
	Review Comment: Register of machines cleaning is presented. Sowing machines were cleaning by water. 03.03.2016, 08.04.2016					
Reviewer name & s	signature:	Fatih Ak	soy			

Notification of Resolution of Noncompliance 3216F-02 Dovira

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	2					11.12.2015		
Noncompliance No			Major	Minör 🔀	Inspection Date	1		
	22	3.06.20	16		Date	02.05.2016		
Data of Natification		5.06.20	10		Dua Data	02.03.2016		
	ate of Notification Due Date 205.103 Recordkeeping by certified operations.							
				nroduction harves	ting and hand	dling of agricultural products that are		
	(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified							
ingredients or food grou		, σσμ	200	persent organis,	0.800)	made man e. game (epeemed		
(b) Such records must:								
(1) Be adapted to the pa			•	-				
(2) Fully disclose all activ	vities and transa	actions o	of the certified o	peration in sufficie	nt detail as to	be readily understood and audited;.		
		-	rt, "Farm Plo	t Inventory, pro	pagation n	naterial and Pest Management"		
were not complete	d for all secti	ions.						
Inspection		§	205.103		ETKO rule	s IACB 10.2		
criteria	NOP reg. ref	f			ref.			
Action taken: OCP Annex Section "Summary All Farms" was filled in and completed.								
Please identify the supp	orting documen	nts, if any	y: 3216F-02 2	2015 June OP 01	1 F 28 Farm	Production Report		
Client.20150525	-		•			·		
		Struk V	ictor Ivanovyc	:h		06.04.2016		
Name, Surname and	d		•		Date			
Signature of Appl. R								
Signature of Appli 1	30.04.201	6						
Review Date	30.04.201	U				Resolved X		
Neview Date						Resolved 🖂		
						Unresolved		
Review Comment:	Confirmed. F	orm is	filled.					
Reviewer name & s	ignature: Fati	ih Akso	ру					

Notification of Resolution of Noncompliance 3216F-02 Dovira

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		3				11.12.2015
Noncompliance No	,	•	Major 🗌	Minör 🖂	Inspection	11.12.2013
Noncompliance No	,		Iviajoi	WIIIIOI 🔼	Date	
		23.06.2	016		Date	03.05.3016
Data of Natification		23.06.20	010		Dua Data	02.05.2016
Date of Notification					Due Date	
§205.202 Land requirer		h				ad an "augania" manata
	Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:					
• •	(a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the					
crop; and	tea sabstan	ccs, as 115tc	a III 3203.103, ap	prica to it for a per	iou or 5 years in	mediately preceding harvest or the
	d boundarie	s and buffe	er zones such as r	unoff diversions to	prevent the unit	ntended application of a prohibited
substance to the						
crop or contact with a p	orohibited su	bstance ap	plied to adjoining	g land that is not ur	nder organic mar	agement.
14.1 OCP They hav	o man of f	arm field	le but buffer z	ones are not de	scribad wall	
14.2 OCP Buffer zo	-				escribed well.	
14.3 OCP Director				•	as not made	on the man.
Inspection			§205.202	t description of	ETKO rules	IACB 6.5.3
criteria	NOP reg.		3203.202		ref.	17(65 0.5.5
Action taken : The			own with the	indication of th		and huffer zones
Action taken. The	ileiu iliap	was reur	awii witii tile	indication of th	e neignbors a	ind burier zones.
Please identify the supporting documents, if any: 3216F-02 Dovira - Map with BZ indication						
	-	Struk \	Victor Ivanovyc	h	07	⁷ .04.2016
Name, Surname an	d		_		Date	
Signature of Appl. 6						
Signature of Appl. 1		0016				
	30.04.2	7016				🖂
Review Date					Re	esolved 🔀
					Uı	nresolved
Review Comment:	The map	with indi	cation of neig	hbors and buffe	er zones is pre	esented. See annex.
Reviewer name & s	ignature	Fatih Ak	sov			
neviewei Haille & S	ignature.	i aum AK	30 y			

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Noncompliance No		4	Major 🗌	Minör 🔀	Inspection Date	11.12.2015
		23.06.20	016			02.05.2016
Date of Notification					Due Date	
organically produced	use organically luced, untreat	y grown se ed seeds a	eeds, annual see and planting stoo	ck may be used to	produce an orga	That, nic crop when an equivalent e production of edible sprouts;
16.2 -16.3 OCP Pro	pagation N	laterial /	Approval form	ms and proves	about the abs	sence of organic seeds in local
market not provide						
16.4 OCP Vendor D		•				
	rm Product	tion Rep	ort, "Propaga	ation Material"	Invoices and	certificates for all used seeds
not provided					T	1
Inspection			205.204a(1)		ETKO rules	IACB 6.4.1, 6.4.2
criteria	NOP reg. r				ref.	
						oout absence of organic seeds
	ndor declai	ration to	or corn is faile	d to be taken I	ecause the fa	arm isn't working with its
supplier anymore.						
DI			22465 02 5	Navius Duamas		le contification and invaling
	-		•		ation materia	Is certificates and invoices,
3216F-02 Dovira - ⁻	11 45 F U1 P		ion iviateriai i ictor Ivanovyo			5.04.2016
Nama Cumana an	لہ	Struk	rictor ivanovyc	ın		5.04.2016
Name, Surname an					Date	
Signature of Appl. I		11.6				
	30.04.20	J16				🖂
Review Date					K	esolved 🔀
					U	Inresolved
					naterial appro	oval form were presented.
Risky GMO produc	t as corn w	as sold a	as convention	nal.		
Reviewer name & s	ignature: F	atih Aks	soy			

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Date: 23.06.2016

Dear Madam / Sir: Zadorozhniy Vitaliy Mikhailovich

On the date (10.12.2015) ETKO Inspector (b) (6), (b) (7)(C) realized an initial inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated above ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during this period and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 6

NC number(s): 15.1, 15.2, 15.3, 15.4, 15.5, 15.6 See below forms

Outstanding noncompliance : None

NC number(s):

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Resolved Noncompliances:

Noncompliance No 1
Date 23.06.2016 Date of Notification Noncompliance: \$205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
Date of Notification Noncompliance: \$205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
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subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination There is a lot of dust in all storages. On the floor are stains from machine oil and
 (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. There is a lot of dust in all storages. On the floor are stains from machine oil and
fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 OCP There is the risks of contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
11.1 OCP There is the risks of contamination.There is a lot of dust in all storages. On the floor are stains from machine oil and
contamination. - There is a lot of dust in all storages. On the floor are stains from machine oil and
- There is a lot of dust in all storages. On the floor are stains from machine oil and
some red color traces. See pictures.
- The walls and gates (made from metal mesh) have holes and birds and other pests can
income to warehouses. See pictures.
- In the old sowing machine are red color traces.
Inspection 205.272 ETKO rules IACB 6.5.3, 11.1
criteria NOP reg. ref ref.
Action taken: The floors are cleaned from stains. The holes are patched. The sowing machines are washed.
Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Register book of storages cleaning 1,2, 3216F-
03 Zhytnitsa - Storages 1-7
Zadorozhniy Vitaliy Mikhailovich 05.04.2016
Name, Surname and Date
Signature of Appl. Resp.
4.0a.a. a. a. k. k. k. k. k.
30.04.2016
Review Date 30.04.2016 Resolved
30.04.2016
Review Date 30.04.2016
Review Date Resolved Unresolved Unresolved Review Comment: The storages are cleaned and operations about cleaning have registered in register book.
Review Date 30.04.2016 Resolved Unresolved Review Comment: The storages are cleaned and operations about cleaning have registered in register book. No dust, stains or other traces are in places. See pictures. The walls and gates (made from metal mesh) have
Review Date Resolved Unresolved Unresolved Review Comment: The storages are cleaned and operations about cleaning have registered in register book.
Review Date 30.04.2016 Resolved Unresolved Review Comment: The storages are cleaned and operations about cleaning have registered in register book. No dust, stains or other traces are in places. See pictures. The walls and gates (made from metal mesh) have

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	2						10.12.2015	
Noncompliance No			Major 🖂	Minör 🗌	Inspection	on		
					Date			
	2:	3.06.201	16		2 4.60		02.05.2016	
Date of Notification		3.00.20.			Due Date	Δ	02.03.2010	
	l l	sed for only	v shipping or stor	age of raw or pro			L ducts labeled as "100 percent organic,"	
"organic," or "made with o								
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	ed only to ship or	store raw	or processed agr	icultural product l	abeled as contair	ning or	rganic ingredients may display the	
following terms or marks: (1) The name and contact in	nformation of the	e certifying	agent which cert	tified the handler	which assembled	l the fi	inal product:	
(2) Identification of the pro		, 0						
(3) Special handling instruct	tions needed to n	maintain th	ne organic integri	ty of the product;				
(4) The USDA seal; (5) The seal, logo, or other	identifying mark	of the cert	ifving agent that	certified the organ	nic production or	handl	ling operation that produced or handled	
the finished product.	iaciiii,iiig iiiaiii	0	,	ocremen the organ	me production of		operation that produced or hamaled	
· ·	•		rocessed agricult	ural product label	ed as containing o	organi	c ingredients must display the	
production lot number of the			uct laheled as ord	ranic intended for	evport to interna	tional	I markets may be labeled in accordance	
		•	-		•		g specifications of a foreign contract	
1		-					e clearly marked "For Export Only" and:	
		-	g and export mus	t be maintained b	y the handler in a	accord	ance with recordkeeping requirements	
for exempt and excluded o	perations under s	9205.101.						
There are no labels	on the stora	ages and	d stored cro	os are not ma	arked.			
Inspection			205.307(a)		ETKO rul	es	IACB 7.5.4	
criteria	NOP reg. ref	f			ref.			
Action taken : Stora	age and crop	s marki	ing labels are	e implement	ed. Procedu	re of	crops marking is made.	
				•				
Please identify the supp	orting documer	nts. if anv	: 3216F-03 Z	hvtnitsa - Ins	struction for	stor	rage personnel, 3216F-03	
Zhytnitsa - Storages	-	,,		,				
		Zadoro	zhniv Vitali	/ Mikhailovid	ch	04	.04.2016	
Name, Surname and					Date		.0412020	
Signature of Appl. R					Date			
Signature of Appl. N	30.04.201	<u></u>						
D. C. D.L.	30.04.201	.0						
Review Date						Ke	solved 🔀	
						Un	resolved	
Review Comment:	Review Comment: Labels are prepared and approved by ETKO. Storages are marked by labels. See pictures							
and annoves			and approv	eu by Liko.	Storages are		rica by labels. See pictures	
and annexes.			and approv	eu by LTRO.	Storages are		rica by labels. See pictures	
and annexes.			and approv	ed by LTKO.	Storages are		rice by labels. See pictures	

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Noncompliance No		3	Major 🗌	Minör 🔀	Inspection Date	10.12.2015		
		23.06.2	2016			02.05.2016		
Date of Notification					Due Date			
§205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must: (1) Be adapted to the particular business that the certified operation is conducting;								
(2) Fully disclose all activ	illes and tra	nsaction	s or the certified o	peration in sumiciei	nit detail as to b	e readily understood and audited;.		
1.3 OCP Annex Farr	n Producti	on Rep	ort, "Farm Plo	t Inventory, pro	pagation ma	aterial and Pest Management"		
were not complete	d for all se	ctions.						
Inspection			§205.103		ETKO rules	IACB 10.2		
criteria	NOP reg. ref				ref.			
Action taken: OCP Annex Farm Production Report was completed.								
Please identify the supp	orting docun	nents, if a	any: 3216F-03 2	2015 June OP 01	LF 28 Farm I	Production Report		
Client.20150525								
		Zado	orozhniy Vitali	y Mikhailovich		4.04.2016		
Name, Surname and	t				Date			
Signature of Appl. R	esp.							
	30.04.2	016						
Review Date					F	Resolved 🔀		
					l	Jnresolved		
Review Comment: Annex Farm Production Report is presented and all sections are filled. See annexes.								
Reviewer name & s	gnature: F	atih Ak	csoy					

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		4				10.12.2015	
Noncompliance No)		Major 🗌	Minör 🔀	Inspection		
					Date		
		23.06.2	016			02.05.2016	
Date of Notification	n				Due Date		
§205.272 Commingling	and contact	with prohi	bited substance	prevention practice	standard.		
` '	•	• .	•			he commingling of organic and	
nonorganic products ar						oduct or ingredient labeled in	
accordance with subpa			nanuling of any o	rganically produced	a agricultural pro	duct of ingredient labeled in	
(1) Packaging materials			s, or bins that co	ntain a synthetic fu	ngicide, preserva	ative, or fumigant;	
						manner as to compromise the	
						ess such reusable bag or container	
has been thoroughly cl	eaned and po	oses no risk	of contact of the	e organically produc	ced product or ii	ngredient with the substance used.	•
11 3-11 4 OCP The	v have no	instructio	ons and proce	dures to keen i	ntegrity of or	ganic products against any	
contamination risk	•	mstract.	ons and proce	dures to keep i	integrity or or	game products agamst any	
Inspection			§205.272		ETKO rules	IACB 6.5.3, 11.3 OCP, 11.4	4
criteria	NOP reg.	ref			ref.	ОСР	
Action taken : "The	Instruction	n for wa	rehouse's per	rsonnel" and "T	he Instruction	n for providing organic	
integrity" are deve	loped. The	e princip	les of organic	integrity are de	fined there.		
,	integrity" are developed. The principles of organic integrity are defined there.						
Please identify the sup	porting docui	ments, if ar	ny: 3216F-03 2	Zhytnitsa - Instr	uction of orga	anic farming, 3216F-03	
Zhytnitsa - Instruct			•	•	· ·	.	
,				y Mikhailovich	04	1.04.2016	
Name, Surname an	ıd				Date		
Signature of Appl.							
Signature of Appli	30.04.2	2016					
Review Date	3010-112	.010			R	esolved 🔀	
Neview Bate							
					U	nresolved 🗌	
Review Comment:	- instructi	ons ahoi	ıt organic gro	wing storing ar	e in place		
- trainings of respo			at organic gro	wing, storing ar	c iii piacc		
- storages are mar			nings are regi	ictored)See ann	ov.		
- Storages are man	keu anu ci	ean (ciea	illigs are regi	istereujsee anni	ex.		
Daviewer news - 0		Catile Ale					
Reviewer name & s	signature:	ratin Ak	soy				

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 15.07.2015

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		5				10.12.2015
Noncompliance No)		Major 🗌	Minör 🔀	Inspection	n
'			' _		Date	
		23.06.2	2016		2 0.00	02.05.2016
Date of Notification	1	23.00.	.010		Due Date	02.03.2010
§205.202 Land requirer					Duc Date	
		harvested	d crops are intend	ed to be sold labe	led or represe	nted as "organic," must:
(a) Have been managed						med as organic, mast.
						immediately preceding harvest of the
crop; and						
	ed boundarie	s and buff	er zones such as r	runoff diversions to	prevent the u	inintended application of a prohibited
substance to the						
crop or contact with a	prohibited su	ibstance a	pplied to adjoinin	g land that is not u	nder organic n	nanagement.
444.000.71		r 	A. b. a b. 66			
14.1 OCP They hav	-				escribed we	ell.
14.2 OCP Buffer zo				•		
14.3 OCP Director	knows nei	ghbors		it description w		
Inspection			§205.202		ETKO rule	S IACB 6.5.3, 14.1-14.3 OCP
criteria	NOP reg.	ref			ref.	
Action taken : The	map of far	rm fields	with the desc	ription of neig	hbors and b	uffer zones is present.
Please identify the supp	orting docu	monts if	nov: 2216E-02 7	hytnitsa - Mar	with indica	ated B7
riease identity the supp	Joi ting docu			y Mikhailovich		14.04.2016
		Zauc	orozininy vitani	y wikitaliovicii		14.04.2016
Name, Surname an					Date	
Signature of Appl. I	Resp.					
	30.04.2	2016				
Review Date						Resolved X
						Unresolved
						omesoived
						e marced on the map by red
color. They care ab	out buffe	r zones.	They carried o	ut training for	workers abo	out growing organic goods. See
annexe – map of fa	arm.					
		:				
Reviewer name & s	signature:	Fatih Al	KSOV			

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		6			l	10.12.2015		
Noncompliance No)		Major 📙	Minör 🔀	Inspection			
		23.06.20	16		Date	02.05.2016		
Date of Notification	,	23.06.20	716		Due Date	02.03.2016		
§205.204 Seeds and pla		nractice sta	ndard		Due Date			
(a) The producer must	-	•		dlings, and planting	stock: Except,	That,		
(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent								
organically produced	ally availabl	e: Excent Ti	hat organically r	aroduced seed mus	t he used for th	ne production of edible sprouts;		
variety is not commercial	any avanabi	c. Except, 11	nat, organicany p	nouuccu seeu mas	it be used for th	re production of cuisic sproats,		
16.2 -16.3 OCP Pro	pagation	Material A	Approval forn	ns and proves a	bout the ab	sence of organic seeds in local		
market not provide	ed.							
16.4 OCP Vendor D	eclaratio	n is not pr	resent					
16.5 OCP Annex Fa	rm Produ	ction Rep	ort, "Propaga	ation Material"	Invoices and	d certificates for all used seeds		
not provided								
Inspection			205.204a(1)		ETKO rules	IACB 6.4.1, 6.4.2		
criteria	NOP reg				ref.			
•	•		• •	•		bout absence of organic seeds		
						is not present. Some		
certificates are not	present,	because 2	2015 harvest	wasn't the orga	inic harvest,	it was sold as conventional.		
Dlease identify the sun	orting docu	iments if an	w: 3216F-03 7	hytnitsa - Pron	agation mat	erial approval form, 3216F-03		
	_		-		_	gation material invoices 2015		
znytmica riopagi				y Mikhailovich		14.04.2016		
Name, Surname an	d				Date			
Signature of Appl. I								
1 0 111 1 1	30.04.	2016						
Review Date						Resolved 🔀		
						_		
					ı	Jnresolved 🗌		
	•	•	•	•		iments related to seeds:		
			tes. Last seaso	on they didn't p	roduce corr	, soya or rapeseed (hi-risk		
GMO products)- VI) is not no	eeded.						
Davience 0	.lanat	Fails At						
Reviewer name & s	ignature:	ratin Aks	soy					

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2158D-01 SUSITAS

Dear Madam / Sir: Umit CAKMAK	Date: 27.07.2016
On the dates (21.07.2016) ETKO Inspector Mr./ Mrs (b) (6), (b) (7)(C)) realized a initial / continuing / recertification / surveillance inspection to yo of (the review was to ensure the completeness of your application) / inspector organic operation's compliance against the regulation (s):	our operation. The objective
USDA National Organic Program	
Based on the application review findings / inspection report dated21.07.2 outstanding noncompliances in your file / operation(s)	016 , ETKO determined the
Please note that, for each noncompliance you MUST act on in due time as indi	cated:
 Please record your corrective action on the boxes "Action Taken" f also submit any supporting documents/records as required by the ou Or 	-
Send a rebuttal with the supporting documents/evidences	
Failure to resolve the outstanding non-compliances will result in	
 suspension or revocation your certification, or denial of your certification 	
Your response must be submitted to the following address, not later than days, starting from the date of this notification)	25.08.2016 (in 30
ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY	
If you have any questions regarding the inspection findings or of the suitability actions please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by fa@etko.org, info@etko.org	
Sincerely	
Enclosure: Inspection report number:	

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

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Noncompliar	ices:							
		16.1			Inspectio	n	21.07.2016	
Noncompliance No)		Major 🖂	Minor	Date			
'		01.08.20					30.08.2016	
Date of Notification	,				Due Date	د		
Noncompliance :	1				1 - 5:5 - 5:5			
§205.201 Organic produc	tion and hand	lling system	nlan.					
			•	pt as exempt or exc	cluded under §2	05.10	1, intending to sell, label, or represent	
							roup(s))" must develop an organic	
- ·		_					ent. An organic system plan must meet	
the requirements set forth (1) A description of practic		_	•			_		
	•	•		_			ion(s) where it will be used, and	
documentation of commer								
(3) A description of the mo performed, to verify that t				ormed and maintair	ned, including th	ne freq	quency with which they will be	
(4) A description of the rec	•			with the requiremen	nts established i	n §20!	5.103:	
				•			nic and nonorganic products on a split	
operation and to prevent of	_			•	•			
(6) Additional information							s. rnment regulatory program for the	
organic system plan: <i>Provi</i>		•	•			Igove	Time it regulatory program for the	
§205.103 Recordkeeping	by certified op	erations.						
- 1 · 1							ral products that are or that are	
(b) Such records must:	a, or represen	ited as 100	percent organic,	organic, or made	with organic (sp	pecine	ed ingredients or food group(s))."	
(1) Be adapted to the parti	cular business	that the cer	tified operation is	conducting;				
(2) Fully disclose all activiti	es and transac	ctions of the	certified operation	in sufficient detail	as to be readily	under	rstood and audited;	
205 204 - 5 205 4	02 b 2 Tb -				- wi-al - w- w/+	ا	ested on the OCD remark	
		_	•				cated on the OCP report.	
			7	•			a 3 different warehouses and	
			-	•			are neither the facility site	
plans nor a docum	ent of own	iership o	r rental agree	ment for the	warehouses	s in t	heir record.	
Inspection			205.201.a.5,		ETKO rules			
criteria	NOP reg.		205.103.b.2		ref.			
Action taken	0							
Action taken								
Please identify the supp	orting docur	ments if an	.v.					
r rease racing the supp	or ting docur	1101103, 11 011						
Name, Surname an	Ч				Date			
Signature of Appl. F					Date			
Signature of Appl. r	vesp.							
5 . 5 .							\square	
Review Date						Res	solved	
						Un	resolved	
Review Comment:								
Reviewer name & s	ignature:							

Nr	GP 18 F 10
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2158D-01 SUSITAS

Noncompliances:

Noncompilan	ces.							
		16.2				Inspectio	n	21.07.2016
Noncompliance No			Major [Minor	\boxtimes	Date		
		01.08.20	16					30.08.2016
Date of Notification						Due Date	<u>)</u>	
Noncompliance :								
and protect organic produc (b) The following are prohil D of this part: (1) Packaging materials, an (2) The use or reuse of any	ic handling of the from conta- bited for use in distorage con bag or contain uct or ingredie	peration musict with prohi in the handlin tainers, or bin ner that has bent placed in the	t implement r bited substan ig of any organ ns that contain been in contain those contain	neasures necessa ces. nically produced a n a synthetic fung ct with any substa ers, unless such r	ry to pre agricultur gicide, pre ance in su eusable l	vent the common the co	ingre fumig as to	ing of organic and nonorganic products dient labeled in accordance with subpart gant; compromise the organic integrity of any s been thoroughly cleaned and poses no
	_	_	•	-				cored as organic but, there even though the labels were
Inspection		1	205.272.a			ETKO rule	٥ς	
criteria	NOP reg.		.03.272.0			ref.	_3	
Action taken	1101 108.					1011		<u> </u>
Please identify the supp	orting docui	ments, if any	y:					
Name, Surname and						Date		
Signature of Appl. R	esp.							
Review Date							Re	solved
							Un	nresolved 🗌
Review Comment:	•							
Reviewer name & s	ignature:							

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Noncompliances:

Noncompilar					-			
Nie de la Person Nie		16.3	 • • • • • • • • • • • • • • • • • •		Inspecti	on	21.07.2016	
Noncompliance No)	01.08.20	Major L	Minor 🔀	Date		30.08.2016	
Date of Notification	1	01.08.20	10		Due Dat	e	30.08.2016	
Noncompliance :	<u> </u>							
\$205.272. Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 205.272.b.2, 205.103.b.2 The caper barrels in which the raw material is contained are used over and over. They indicated that these barrels are cleaned with water before dispatching to the producer by Susitas but								
there is no record			icanca w	itii water before	dispateriiii	5 10	the producer by sustain suc	
Inspection		2	205.272.b.	2	ETKO ru	les		
criteria	NOP reg.	ref 2	205.103.b.	2	ref.			
Action taken								
Please identify the supp	porting docu	nents if an	v.					
ricuse identity the supp	orting docu		y·					
Name, Surname an				Date				
Signature of Appl. I	Resp.							
Review Date						Re	solved	
						Ur	nresolved	
Review Comment:								
Reviewer name & s	ignature:							

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Noncomplian	ces:								
		16.4			Inspectio	n 2	21.07.2016		
Noncompliance No	,		Major 🗌	Minor 🖂	Date				
•		01.08.20				3	30.08.2016		
Date of Notification	1				Due Date				
Noncompliance :									
§205.103 Recordkeeping	by certified o	perations.							
	(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are								
•	d, or represer	nted as "100	percent organic," "	organic," or "made w	ith organic (sp	pecified i	ngredients or food group(s))."		
(b) Such records must:(1) Be adapted to the parti	cular busines	s that the cer	tified operation is o	onducting:					
(2) Fully disclose all activiti	es and transa	ctions of the	certified operation	•	to be readily	underst	ood and audited;		
(3) Be maintained for not le									
(4) Be sufficient to demons(c) The certified operation					ig normal busi	iness ho	urs by authorized representatives of		
the Secretary, the applicab									
•		_		•	•	_	anic capers were found,		
conventional caper				•	-		-		
							ction weren't seen and so,		
		-			_		put couldn't be made (for		
the citric acid input	used in t	he organi	c production	3+ ¾ sack of (b	(4)	bra	inded citric acid whereas		
		n 1 sack c	of ^(D) ⁽⁴⁾ brand	ed citric acid us	sed were s	een b	ut, they couldn't be found		
on the inventory ca	ırd.)								
T.						-			
Inspection			205.103.b.2, 2	05.103.с	ETKO rule	es			
criteria	NOP reg.	ref			ref.				
Action taken									
Please identify the supp	orting docu	ments, if an	y:						
Name Company	۵.				Data				
Name, Surname and					Date				
Signature of Appl. R	esp.								
D. L. D.L.									
Review Date						Reso	ived		
						Llaga	and and		
						Unre	solved		
Review Comment:									
Review Comment:									
Davidavvau 0 -	:								
Reviewer name & s	ignature:								

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Noncomplia			1			Г		
		16.5		. a.	_	Inspectio	n	21.07.2016
Noncompliance No		04 00 00	Major 🔀	Minor		Date		20.00.2046
Data of Natification		01.08.20	116			Due Dete		30.08.2016
Date of Notification	1					Due Date		
produced and handled wit (a) Synthetic substances a (b) Nonsynthetic substance (c) Nonagricultural substan (d) Nonorganic agricultural (e) Excluded methods, exc (f) Ionizing radiation, as de (g) Sewage sludge. §205.271 Facility pest ma (a) The producer or handle (1) Removal of pest habita (2) Prevention of access to (3) Management of enviro (b) Pests may be controlle (1) Mechanical or physical (2) Lures and repellents us (c) If the practices provide substance consistent with (d) If the practices provide not on the National List m to be taken to prevent cor (e) The handler of an orga operation's organic handli measures taken to preven (f) Notwithstanding the pr control pests as required b produced products or ingr 205.105.a.b, 205.2 Susitaş were notifi not defined on the the areas" by the p	coopercent organic hout the use of and ingredients, or es prohibited in noces used in or or all substances use ept for vaccines escribed in Food enagement practer of an organic at, food sources, or handling facility on the late of the organic hout of the organic hout of the organic hout of the organic handling open graphant or effect of the actices provided by Federal, State edients with the cooper of the organic handling open graphant or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or effect or the organic handling or eff	anic," "orgalic except as programs, anic," "orgalic except as programs, and processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in or on processed in proces	rovided in §205.60 or §205.604; d products, exceptorocessed product. That, the vaccines administration regulations are as a management of the second of the	t as otherwises, except as o are approvedulation, 21 CF t practices to numidity, atm ght, or sound; sistent with the are not effect tion are not ed certifying aging redients we thetic or synth and methods as or ingredier, and (d) of the s: Provided, The hat they conduct the conduct of the c	prevent osphere or ne Natio ive to pr ffective ent agre ith the s etic sub of appli its with is sectio at, mea	ed in §205.605 e provided in §	rol pe contribute date of the period of the	t not limited to: t, to prevent pest reproduction. ests, a nonsynthetic or synthetic ol facility pests, a synthetic substance e, method of application, and measures or control pests must update the d organic plan must include a list of all
Inspection			205.105.a.b, 2	205.271.e		ETKO rule	es	
criteria	NOP reg. r					ref.	-	
Action taken		1						1
Please identify the supp	porting docum	ents, if an	y:			 		
Name, Surname an	d					Date		

Notification (of	Noncompl	iance	
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Date	15.07.2015
Rev	00
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245	D 04	CLICIT	
Z12 (2D-0T	. SUSI1	AS

Signature of Appl. Resp.	
Review Date	Resolved
	Unresolved
Review Comment:	
Reviewer name & signature:	

From: <u>Ceren BAYAZIT</u>

To:sm.ms.NOPACAAdverseActionsCc:ma@etko.org; fa@etko.org

Subject: Notification of Resolution of Non-Compliances- Susitas 2158D-01

Date: Thursday, August 04, 2016 10:01:02 AM

Attachments: <u>image001.jpq</u>

2158D-01 SUSITAS GP 18 F 10 Notification of Noncompliance NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Susitas 2158D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>info@susitas.com</u>

Subject: Notification of Resolution of Non-Compliances- Susitas 2158D-01

Date: Tuesday, August 30, 2016 11:55:57 AM

Attachments: <u>image001.jpc</u>

image001.jpg NRONC 2158D-01 SUSITAS.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Susitas 2158D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

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Date: 30.08.2016

Dear Madam / Sir: Umit CAKMAK

On the date **(21.07.2016)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **continuing inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org, info@etko.org .

Sincerely

Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 5

NC number(s): 16.1, 16.2, 16.3, 16.4, 16.5 See below forms

Outstanding noncompliance : None

NC number(s):

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Resolved N	loncompl	iances	s:				
	1	6.1			Inspection	21.07.2016	
Noncompliance No	0		Major 🔀	Minor 🗌	Date		
·	C	1.08.20	016			30.08.2016	
Date of Notification	n				Due Date		
Noncompliance :	•					•	
Noncompliance: \$205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under \$205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in \$205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations. (b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: Provided, That, the submitted plan meets all the requirements of this subpart. \$205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records							
•			_			t in 3 different warehouses and	
			-	-		ere are neither the facility site	
plans nor a docum	ent of owne	rsnip o	r rental agreer	nent for the w	arenouses i	n their record.	
Inspection			205.201.a.5,		ETKO rules		
criteria	NOP reg. re	ef	205.103.b.2		ref.		
Action taken							
There was no warehouse in Menemen. Yet, in Turgutlu there was but it was closed down last week and all organic raw materials were transported to Çiğli facility. All organic raw materials are kept in Çiğli now.							
Please identify the supp				aw materials at Çi			
Name, Surname an		Umit C	CAKMAK		Date	29.08.2016	
Signature of Appl. I		4.6					
Review Date	30.08.20	16				Resolved 🔀	
						Unresolved 🗌	
Review Comment:							
		been t	ransferred to (Çiğli facility and	the relate	d evidences are provided.	
(See annex resolut	tion NC 1)						

Reviewer name & signature: Mustafa AKYÜZ

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		16.2				Inspection	21.07.2016
Noncompliance No)		Major 🗌	Minor		Date	
		01.08.20	16				30.08.2016
Date of Notification	1					Due Date	
Noncompliance: §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 205.272.a After receiving the organic products, the products are labelled and stored as organic but, there was no labelling on the caper barrels which are stated as conventional product even though the labels were							
prepared.			205 272			ETIKO - I	T
Inspection criteria	NOP reg.		205.272.a			ETKO rules ref.	
Action taken	NOF TEg.	161				161.	
Labels of conventional caper barrels have been started to be used on the barrels again. Please identify the supporting documents, if any: The photos of conventional caper barrels.							
Name, Surname and	d	Umit C	AKMAK			Date 29	9.08.2016
Signature of Appl. R	Resp.						
Review Date	30.08.2	2016				R	esolved 🔀
						U	nresolved 🗌
Review Comment: The pictures of the labels of conventional caper barrels have been sent to ETKO, all barrels were labelled as shown in the pictures. (See annex resolution NC 2) Reviewer name & signature: Mustafa AKVÜZ							

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Date	15.07.2015
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		16.3			Inspection	21.07.2016				
Noncompliance No		10.5	Major [Minor 🖂	Date	21.07.2010				
Noncompliance No)	04.00.30	Major	IVIIIIOI 🔼	Date	20.00.2046				
		01.08.20	016			30.08.2016				
Date of Notification)				Due Date					
•	Noncompliance :									
§205.272 Commingling and contact with prohibited substance prevention practice standard.										
	(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.									
	bited for use in	n the handli	ng of any organical	lly produced agricultu	ral product or ingr	edient labeled in accordance with subpart				
D of this part: (1) Packaging materials, an	id storage cont	tainers or h	ins that contain a s	vnthetic fungicide nr	reservative or fum	igant:				
	_					compromise the organic integrity of any				
	•	•	·		bag or container h	as been thoroughly cleaned and poses no				
risk of contact of the organ	nically produce	d product o	r ingredient with ti	ne substance used.						
205 272 h 2 205 10	02 h 2 Th	o canor k	aarrole in whi	ch the raw mate	orial is contai	ned are used over and over.				
-						the producer by Susitas but				
there is no record t			cleaned with	water before u	ispatching to	the producer by Susitaş but				
	o evidenci		205.272.b.2		ETKO rules					
Inspection	NOD soc									
criteria	NOP reg.	rei	205.103.b.2		ref.					
Action taken										
Records are attach	ea.									
Diagram in the state of the sta			DD 634 ED	20		UK KONTROL FORMU				
Please identify the supp			19: PR_631FK_ CAKMAK	70BIDON LEMIZI		IK KONTROL FORMU 9.08.2016				
Name, Surname an		Omite	ANIVIAN		Date 2	9.08.2016				
Signature of Appl. F	- 1	016								
30.08.2016					R	esolved 🔀				
Review Date					U	nresolved 🗌				
Review Comment:										
Evidence of cleaning records was provided. (See annex resolution NC 3)										

Reviewer name & signature: Mustafa AKYÜZ

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Date	15.07.2015
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	16.4			Inspection	21.07.2016				
Noncompliance No		Major 🗌	Minor 🔀	Date					
	01.08.	2016			30.08.2016				
Date of Notification				Due Date					
Noncompliance :									
§205.103 Recordkeeping I	•			la a a dita a a Caracta di In	and an electrical section of the con-				
	(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."								
(b) Such records must:	(b) Such records must:								
(1) Be adapted to the partic(2) Fully disclose all activitie				es to be readily und	erstood and audited:				
(3) Be maintained for not le			i iii saincient detaii a	is to be readily und	erstood and addited,				
(4) Be sufficient to demonst				:					
the Secretary, the applicable					s hours by authorized representatives of				
,, ,,		,	, 5 5						
205.103.b.2, 205.10	3.c - During the	inspection, onl	y the accounti	ng records of	organic capers were found,				
conventional caper	records and the	stock-sales cha	rts were not p	erepared for	the inspection.				
- The stock records	for the auxiliary	product (citric	acid) used in th	ne organic pro	duction weren't seen and so,				
				_	d input couldn't be made (for				
the citric acid input					branded citric acid whereas				
•		of (b) (4) brand	led citric acid u	ised were see	n but, they couldn't be found				
on the inventory ca	rd.)			1					
Inspection		205.103.b.2, 2	205.103.c	ETKO rules					
	NOP reg. ref			ref.					
Action taken									
	t for organic con	ventional cape	r inventory rec	ords and the	stock records for using inputs				
and input invoices.									
Please identify the suppo	orting documents if	anv.							
Trease ractiony the suppl	_	CAKMAK		2	9.08.2016				
Name, Surname and	d l			Date					
Signature of Appl. R									
, ,	30.08.2016			R	esolved 🔀				
Review Date									
Review Comment:	Paview Comment:								
neview comment.									
Organic convention	al caper invento	rv records were	e provided.						
The stock records for	•	•	•	ed.					
(See annex resolution NC 4)									
Reviewer name & si	gnature: Mustaf	a AKYÜZ							

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Date	15.07.2015
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		16.5				Inspectio	n	21.07.2016
Noncompliance No			Major 🖂	Minor	7	Date		
'		01.08.20						30.08.2016
Date of Notification						Due Date	9	
Noncompliance :								
§205.105 Allowed and pro To be sold or labeled as "10 produced and handled with (a) Synthetic substances an (b) Nonsynthetic substance (c) Nonagricultural substan (d) Nonorganic agricultural (e) Excluded methods, exce (f) lonizing radiation, as des (g) Sewage sludge.	20 percent orga- nout the use of id ingredients, or es prohibited in ces used in or or substances use ept for vaccines	anic," "orga : except as p §205.602 on processe ed in or on s: Provided,	anic," or "made with provided in §205.60 or §205.604; ed products, excep processed product That, the vaccines	th organic (special or §205.603) that as otherwise is, except as otherwise is are approved	cified in ; provide herwise in acco	gredients or f ed in §205.605 e provided in § rdance with §	food gr 5; §205.6	
(b) Pests may be controlled (1) Mechanical or physical of (2) Lures and repellents usi (c) If the practices provided substance consistent with the distriction of the National List mat to be taken to prevent confusion of the National List mat object in the practices provided not on the National List mat to be taken to prevent confusion of the National List mat object in the Nation	r of an organic c, food sources, handling facilit mental factors I through: controls includi ng nonsyntheti I for in paragra the National Lis I for in paragra by be applied: P tact of the orga ic handling ope g plan to reflec contact of the actices provided y Federal, State	facility must and breed ies; and s, such as te ing but not ic or synthe phs (a) and at may be a phs (a), (b) provided, The inically pro- ceration who ct the use of organically d for in para e, or local la	st use managementling areas; emperature, light, left limited to traps, light substances cond (b) of this section applied. It is and (c) of this section at, the handler and duced products or of applies a nonsyntof such substances are produced product agraphs (a), (b), (c) aws and regulation	humidity, atmo ght, or sound; of sistent with the are not effective tion are not effective difference of the difference the difference of the difference of the difference of the difference of the difference	osphere or e Natio ve to pr fective ent agre th the s etic sub of applic ts with s s section	e, and air circul mal List. revent or cont to prevent or se on the subs substance used stance to prevention. The up the substance n, a handler m	controstance, d. vent or odated e used.	sts, a nonsynthetic or synthetic of facility pests, a synthetic substance, method of application, and measures or control pests must update the organic plan must include a list of all
205.105.a.b, 205.27	1.e - Altho	ough the	ey indicated t	hat they d	idn't	apply indo	oor s	praying, it was seen that
Susitaş were notifie	ed on their	perforn	nance report	dated 16.0	3.20 1	16 as "the	use	of a prohibited substance
							ateri	al) had been detected in all
the areas" by the p	est control	compa	ny they coope	erate with,	(b) (²	4)		The
				•		that there	was	spraying in all the areas
including the produ	iction area		•		1			
Inspection			205.105.a.b,	205.271.e		ETKO rule	es	
criteria	NOP reg. r	ef				ref.		
Action taken								
	tion for ou	tdoor aı						g on the report .Actually r came to the facility and
Please identify the supp	orting docum	ents, if ar	ny: The fixed pest	t control repo	ort			
Name, Surname and	d	Umit C	CAKMAK			Date	29.	08.2016

Signature of Appl. Resp.

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Review Date	30.08.2016	Resolved Unresolved
Review Comment:		
	responsible for pest rodent control corrected their report the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in question was processed in the company declared that the report in the company declared the company	
Reviewer name & sig	nature: Mustafa AKYÜZ	

3220F-01 AgroDIS

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Date	15.07.2015
Rev	00
Page	1/2

Dear Madam / Sir: Suslova Lina Ivanivna Date: 17.11.2016

On the dates (09.09.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **09.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

• Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

3220F-01 AgroDIS

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 GP 18 F 10

 Date
 15.07.2015

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Operator unit no.	322	0F-01	Unit nan	ne Agrol	DIS			
Location - Adres	v.Ko	hovka, Ananie	vskiy distric	ict, Odessa region Ukraine				
Initial Inspection		Surveillance I	Inspection	Report no 3220F-01.2016.ac				
Subject of nonconfor	Std or re	g. Art. nr. NOP	205.201(a2) NCD N	2015 1			
Inspection Date	mity D	09.09.2016	7.2 2.15	9		NCKN	2016.1	
Date of Notification		17.11.2016			Due Date		17.12.2016	
	☐ Majo				(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	M1-6.1, 7		
☐ Factors causing risk o		□ Factors caus			ion of the product.			
Use of inputs which a	1000000		tions	■ Production p			The second second second	
and the second			tions.	- Froduction p	nocess plan p	artiy imple	Heilted.	
□ Non-Organic product□ Requirements of regu			od	,				
☐ Frequent minor non-cregulation.	A but a control frame at	SORTHWAY AND A TOTAL OF THE						
☐ Customer complaints actions, or complaints ar								
☐ Misuse of the licenses	s and certifi	cates						
☐ Production process pl	lan not imp	lemented.						
				nformity by I	Department of the same			
§205.201 Organic prod (a) The producer or hand	dler of a pro ultural proc	oduction or handli lucts as "100 perc production or ha	ing operation ent organic," ndling system	"organic," or "m plan that is agre	nade with orga eed to by the	anic (specifi producer o	ed ingredients or food	
group(s))" must develop accredited certifying age handling. An organic pro (1) A description of pract performed; (2) A list of each substan be used, and documenta Issues: - Organic fertilia - Propagation Material	ent. An organization or tices and proceed to be used to	handling system procedures to be procedures to be procedured as a production mercial availability and protectors we	olan must inclerformed and nor handling ity, as applicate not assess	lude: I maintained, inc input, indicating ble; sed by ETKO before	; its compositi	equency wit ion, source,	h which they will be	
group(s))" must develop accredited certifying age handling. An organic pro (1) A description of pract performed; (2) A list of each substan be used, and documenta Issues: - Organic fertilia	ent. An orga oduction or tices and pr ace to be us ation of con zers and pla Approval fo	handling system procedures to be procedures to be procedured as a production mercial availability and protectors we	plan must inclerformed and or handling ity, as applicate not assess efore sowing	lude: I maintained, inc input, indicating ble; sed by ETKO before	its compositions its composition its compositi	equency wit	h which they will be	
group(s))" must develop accredited certifying age handling. An organic pro (1) A description of pract performed; (2) A list of each substant be used, and documental ssues: - Organic fertiliar - Propagation Material Inspector Name and	ent. An orga oduction or tices and pr ace to be us ation of con zers and pla Approval fo	handling system procedures to be procedures to be procedures as a production mercial availability and protectors we arm is not done between the procedure	olan must inclerformed and nor handling ity, as applicate not assess efore sowing Operat	lude: I maintained, inc input, indicating ble; sed by ETKO befor . Seeds were not	r its composition ore application t approved by ignature	equency wit	h which they will be location(s) where it wil	
group(s))" must develop accredited certifying age handling. An organic pro (1) A description of pract performed; (2) A list of each substan be used, and documental ssues: - Organic fertilia - Propagation Material a Inspector Name and	ent. An organization or tices and proceed to be used to	corrections (b) (7)(C)	olan must inclerformed and nor handling ity, as applica are not assess efore sowing Operat Ctive Action	lude: I maintained, inc input, indicating ble; ided by ETKO befor Seeds were not or name and si	r its composition ore application to approved by ignature	equency with ion, source, on y ETKO. Suslova	h which they will be location(s) where it wi	

Explanations:

3220F-02 SVITANOK Stari Mayaky

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/2

Dear Madam / Sir: Oliyarchuk Ivan Ivanovich Date: 17.11.2016

On the dates (10.09.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **10.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-02 SVITANOK Stari Mayaky

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/2

Non-comp	oliances:								
Operator uni	t no.	220F-02	Unit na	me	SVITANO	OK Stari N	1ayaki		
Location - Ad	res v.	Stari Mayaki, Shirya	evskiy d	istrict, Od	essa reg	ion, Ukrai	ine		
Initial Inspect	tion	Surveillance Ins	pection	Report no 3220F-02.2016.ac					
Subject of no	nconformity		Std or re	g. Art. nr.	NOP 20	5.201(a2)		0.550	
Inspection D	Design Carried	Documentation	510 01 10	6. A	1101 20	J.E01(02)	NCR No 20	16.1	
Date of Notif		10.09.2016			- 15	Data		- A-1940	
Date of Notif	C-07000	17.11.2016		1	- 4	ue Date		7.12.2016	
	M	ajor				⊠ Minor I	M1-6.1, 7.7, 8	3.2	
☐ Factors caus	sing risk on the pro	oduct		Factor	s causing	no risk on	the condition o	of the product.	
Use of input	s which are not al	lowed by the regulation	ns.	■ Produc	tion proc	ess plan pa	artly implement	ted.	
☐ Non-Organic	product sales as	organic.							
☐ Requiremen	ts of regulation or	standard not applied							
☐ Frequent mi regulation.	nor non-conformi	ties on the same requir	ement of						
		dled, failure on taking r n records not available.							
☐ Misuse of th	e licenses and cer	tificates							
☐ Production p	process plan not in	mplemented.							
		Description of	of Nonco	onformity	by Insi	pector			
label, or repres group(s))" mus accredited cert handling. An or (1) A descriptio performed; (2) A list of each be used, and do Issues: - Orga	sent agricultural prit develop an organicifying agent. An organic production on of practices and h substance to be ocumentation of canic fertilizers are	production or handling roducts as "100 percennic production or handling system plan mus or handling system plan procedures to be perfused as a production of commercial availability, and plant protectors to boyal form is not don	t organic,' ling syster t meet th n must inco ormed an or handling as applica	"organic," n plan that e requireme lude: d maintaine s input, indi ible;	or "made is agreed ents set for ed, includi cating its	e with orga to by the p orth in this ing the free composition	nic (specified in producer or har section for org quency with wh on, source, loca	ngredients or for ndler and an ganic production nich they will be ntion(s) where in	ood n or
Inspector Na		(b) (6), (b) (7)(C)		tor name a				van Ivanovich	n
signature		C-111-111		Diam'r.					
Seeds, Organ	ic fertilizers and	d plant protectors w		olied with			future.		
Target date	Target date 17.12.2016 Operator name and signature Ivanov					Actual C	Completion		
	Verifica	ation of Operator's o	orrective	action ar	nd imple	mentatio	n by ETKO		
Accepted:	YES NO					pproval			
Evolunations:	13-01-0-2	L Date			LINU	phional			

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>makzimka@mail.ru</u>

Subject: Notification of Non-Compliances_ Ukrfield 3220

Date: Thursday, November 17, 2016 2:19:44 AM

Attachments: <u>image001.jpg</u>

3220F-01 AgroDIS - GP 18 F 10 Notification of Noncompliance NONC.pdf 3220F-02 Svitanok - GP 18 F 10 Notification of Noncompliance NONC.pdf 3220F-03 Marianivske - GP 18 F 10 Notification of Noncompliance NONC.pdf 3220F-04 Rodina - GP 18 F 10 Notification of Noncompliance NONC.pdf

Importance: High

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Ukrfield 3220F-01, 3220F-02, 3220F-03 and 3220F-04. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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

3220F-03 TOV AGROFIRMA MARYANIVSKA

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/2

Dear Madam / Sir: Gamarc Vladimir Nikolaevich Date: 17.11.2016

On the dates (09.09.2016) ETKO Inspector (b) (6), (b) (7) (C) realized a surveillance inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **09.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: <a href="mailto:ma

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-03 TOV AGROFIRMA MARYANIVSKA

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/2

Non-comp	liances:							
Operator unit	no. 32	20F-03	Unit na	me	TOV AG	ROFIRMA	MARYANIV	SKA
Location - Adr	es v.	Maryanivka, Shyry	aivskiy di	strict, O	dessa reg	ion, Ukrai	ne	
Initial Inspect	ion	Surveillance In	spection	■ Report no 3220F-03.2016.ac				
Subject of no	nconformity	Documentation	Std or re	g. Art. n	r. NOP 20)5.201(a2)	NCR No 2	016.1
Inspection Da	ite	09.09.2016						
Date of Notif	ication	17.11.2016			1	ue Date	1	7.12.2016
	□Ма	ajor				⊠ Minor	M1-6.1, 7.7,	8.2
Factors causi	ng risk on the pro	duct		☐ Fact	ors causing	no risk on	the condition	of the product.
Use of inputs	which are not all	owed by the regulation	ons.	■ Proc	luction pro	cess plan pa	artly implemen	nted.
	product sales as o							27.00
		standard not applied	d					
the same of the same of	Service Contract Cont	ties on the same requ						
		lled, failure on taking records not available						
☐ Misuse of the	licenses and cert	tificates						
☐ Production p	rocess plan not in	nplemented.						
		Description						
group(s))" must accredited certi handling. An org (1) A description performed; (2) A list of each be used, and do Issues: - Orgar - Plant protector	develop an organ fying agent. An organic production of n of practices and a substance to be cumentation of colic fertilizers were ors were not assess	oducts as "100 perce nic production or han ganic system plan mo or handling system pl procedures to be per used as a production ommercial availability a not assessed by ETK ssed by ETKO before TKO before sowing.	dling syster ust meet th an must inc rformed and or handling y, as applica (O before a	n plan the e require clude: d maintai g input, in able; pplicatio	at is agreed ments set in ned, include dicating its	to by the properties to by the properties the properties to be the free to be the free to be the properties to be	oroducer or ha section for or quency with w	ndler and an ganic production hich they will be
Inspector Nar		(b) (6), (b) (7)(C)	Operat	or name	e and sign	ature	Gamarc Vla	dimir Nikolaev
		Correc	tive Action	n Plan b	Operato	or		
Seeds, Organi	c fertilizers and	plant protectors v	will be app	lied wit	h ETKO a	oproval in	future.	
Target date	17.12.2016	Operator name and signature	Gamar Nikola	c Vladin evich	nir	Actual C	Completion	
	Verifica	tion of Operator's	corrective	action	and imple	ementatio	n by ETKO	
Accepted:	YES NO			21970	The same of	approval		

Notification of Noncompliance

3220F-04 Rodina

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/3

Dear Madam / Sir: Salamaha Vasiliy Dmitrievich Date: 17.11.2016

On the dates (08.09.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a surveillance inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **08.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

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

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance

3220F-04 Rodina

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/3

Non-compliance	Non-compliances:									
Operator unit no.	3220F-04	Unit name	Rodina							

Location - Adres v.Plahteivka, Saratskiy district, Odessa region, Ukraine

Initial Inspection	Compillation Instrumentary -	D-10-14 0-1 2220F 04 2045	
	Surveillance Inspection	Report no 3220F-04.2016.ac	

Documentation St	d or reg	eg. Art. nr. NOP 205.201(a2) NCR No 2016.1					
08.09.2016							
17.11.2016	17.11.2016 Due Date 17.12.						
lajor			M1-	6.1, 7.7, 8.2			
roduct		☐ Factors causing no risk or	n the	condition of the product.			
llowed by the regulations.		■ Production process plan p	partly	implemented.			
☐ Non-Organic product sales as organic.							
or standard not applied	- 1						
ities on the same require	ment of						
☐ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.							
rtificates							
implemented.							
	08.09.2016 17.11.2016 Aajor oduct Illowed by the regulations organic. or standard not applied lities on the same require on taking remains or the same records not available.	08.09.2016 17.11.2016 Aajor oduct Illowed by the regulations. organic. or standard not applied ities on the same requirement of odled, failure on taking remedial in records not available.	08.09.2016 17.11.2016 Due Date Minor oduct Factors causing no risk of the regulations. organic. or standard not applied inties on the same requirement of the same requirement of the same records not available. rtificates	08.09.2016 17.11.2016 Major Minor M1- Oduct Factors causing no risk on the companie. Forganic. For standard not applied dities on the same requirement of added, failure on taking remedial in records not available.			

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed:

(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

Issues: - Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO

- Organic fertilizers and plant protectors were not assessed by ETKO before application.

Inspector Name and signature

Operator name and signature

Salamaha Vasiliy Dmitrievich

Corrective Action Plan by Operator

Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.

Target date 17.12.2016 Operator name and signature Salamaha Vasiliy Dmitrievich Actual Completion date

Verification of Operator's corrective action and implementation by ETKO									
Accepted:	YES 🗆	NO 🗆	Date	ETKO approval					
Explanation	ns:								

Notification of Noncompliance 3220F-04 Rodina

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	3/3

WILLIAM THE	no. 32	20F-04	Unit nar	ne Ro	dina			
Location - Adr	es v.	Plahteivka, Sarats	kiy district	Odessa reg	ion, Ukraine			
Initial Inspect	ion	Surveillance I	nspection	Report no 3220F-04.2016.ac				
Subject of nor	nconformity	Documentation	Std or re	reg. Art. nr. NOP 205.272a NCR No 2016.2				
Inspection Da	ate	08.09.2016			V			
Date of Notifi	ication	17.11.2016			Due Date		17.12.2016	
	□ Ma	ajor			⊠ Mi	nor M1-5.1	12	
☐ Factors causi	ing risk on the pro	duct		☐ Factors o	ausing no risk on	the condition	on of the product.	
☐ Use of inputs	which are not all	owed by the regulat	ions.	■ Production	on process plan p	artly implen	nented.	
□ Non-Organic	product sales as o	organic.					W. W. V.	
- Laboratory of Contract		standard not applie	d					
☐ Frequent mir regulation.	nor non-conformit	ties on the same req	uirement of					
		lled, failure on takinį records not availabl						
☐ Misuse of the	e licenses and cert	tificates						
☐ Production p	rocess plan not in	nplemented.						
ALCOHOLD BY								
5205 272 Com	mingling and cont				y Inspector			
(a) The l	handler of an orga nonorganic produ	act with prohibited	substance pr ion must imp nic products	evention practices of the property of the prop	ctice standard. ures necessary to with prohibited			
(a) The l	handler of an orga nonorganic produ are not marked i	ance with prohibited anic handling operations and protect organics.	substance prion must imp nic products ages are not	evention practices of the property of the prop	ctice standard. ures necessary to with prohibited ganic.	substances.	e commingling of organic	
(a) The I and I	handler of an orga nonorganic produ are not marked i	anic handling operations and protect organic handling operations and protect organic handling operations and protect organic handling operations and protect organic handling of the storages. Storages (6), (6), (7), (6)	substance prior must impinic products ages are not	evention practice of the property of the prope	ctice standard. ures necessary to with prohibited rganic. d signature	substances.		
(a) The I and I ssues: - Crops Inspector Nan signature	handler of an orga nonorganic produ are not marked i ne and	anic handling operations and protect organic handling operations and protect organic handling operations and protect organic handling operations and protect organic handling of the storages. Storages (6), (6), (7), (6)	oubstance prion must impinic products ages are not Operat	or name and	ctice standard. ures necessary to with prohibited rganic. d signature erator	Salamaha		
(a) The i and i	handler of an orga nonorganic produ are not marked i ne and	cact with prohibited anic handling operations and protect organism the storages. Storages (b) (6), (b) (7)(C)	oubstance prion must implice products ages are not Operat citive Action will be app	or name and Plan by Oplied with ET	tice standard. ures necessary to with prohibited ganic. d signature erator KO approval in	Salamaha	a Vasiliy Dmitrievich	
(a) The I and I ssues: - Crops Inspector Nan signature	handler of an organonorganic production are not marked in the and the fertilizers and the second sec	cact with prohibited anic handling operations and protect organ the storages. Storages (b) (6), (b) (7)(c) Correct plant protectors Operator name	Operat Cope	or name and Plan by Oplied with ET	tice standard. ures necessary to with prohibited ganic. d signature erator KO approval in Actual of	Salamaha future.	a Vasiliy Dmitrievich	
(a) The I and I lssues: - Crops Inspector Nansignature Seeds, Organi Target date	handler of an organonorganic production are not marked in the and the fertilizers and the second sec	cact with prohibited anic handling operations and protect organs the storages. Storages (b) (6) (b) (7)(c) Correct plant protectors Operator name and signature	Operat Citive Action Salama Dmitries Scorrective	or name and Plan by Oplied with ET	tice standard. ures necessary to with prohibited ganic. d signature erator KO approval in Actual of	Salamaha future.	a Vasiliy Dmitrievich	

Notification of Noncompliance

3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/3

Dear Madam / Sir: Alexey Kachkovskiy Date: 17.10.2016

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

USDA National Organic Program

Based on the inspection report dated **07.10.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

• Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

• Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.11.2016** (in 30 days, starting from the date of this notification)

ETKO 160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

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

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Notification of Noncompliance 3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
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•	v٠	,,,		v		Ю.	нс	4 I I	·	C	,

Operator unit	no.	3188	3D-01	Unit nan	name VIP Group					
Location - Adre	es		oryspilska str., Ky		ne					
				•						
Initial Inspection	on		Surveillance Ins	pection	Report no 3188D-01.2016.ac					
Subject of non	conformity		ocumentation	Std or reg	g. Art. nr	. NOP 20)5.201(a1)	NCR No	2016	1
Inspection Da			07.10.2016					IVER IVE	2010	.1
Date of Notific	cation		12.10.2016				Due Date		12.1	1.2016
		Maj					— [Minör		
☐ Factors causin	ng risk on the	produ	ct		☐ Facto	ors causing	g no risk on t	he condition	on of tl	ne product.
☐ Use of inputs	which are not	allow	ed by the regulatio	ns.	■ Produ	uction pro	cess plan par	tly implen	nented	
☐ Non-Organic p	oroduct sales	as org	anic.							
☐ Requirements	of regulation	or sta	andard not applied							
☐ Frequent min- regulation.	or non-confor	mities	s on the same requi	rement of						
	-		d, failure on taking i cords not available.							
☐ Misuse of the	licenses and	certific	cates							
☐ Production pr	ocess plan no	t impl	emented.							
			Description of	of Nonco	nformit	ty by Ins	pector			
			nandling system pla						- 404	
label, or represe group(s))" must accredited certifi	nt agricultura develop an or ying agent. Aı	l prod ganic n orga	duction or handling ucts as "100 percen production or hand nic system plan mus handling system pla	t organic," ling system st meet the	"organic, plan tha requiren	" or "mad t is agreed	e with organ I to by the pr	ic (specifie oducer or	d ingre handle	edients or food er and an
(1) A description performed;	of practices a	and pr	ocedures to be perf	ormed and	maintair	ned, includ	ling the frequ	uency with	which	they will be
Issue: A5.3 Reg	gistration fo	rm of	f complaints and	register a	re prese	nted but	there is no	complai	nt pro	ocedure
Inspector Nam signature	e and	(b) (6), (b) (7)(C)	Operat	or name	and sign	nature	Alexey Ka	achko	vskiy
		<u> </u>	Correcti	ive Action	Plan by	Operato	or			
Target date	Target date 12.11.2016 Operator name and signature Alexey			Alexey	Actual Completion date					
			on of Operator's o	corrective	action a	and impl	ementation	by ETKO		
•	/ES □ 1	NO 🗆	Date			ETKO	approval			
Explanations:										

Notification of Noncompliance 3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	3/3

Operator unit no.	33	188D-01	Unit nam	ie	VIP Gro	up			
Location - Adres	9,	, Boryspilska str., Ky	iv, Ukrain	e					
Initial Inspection		Surveillance Ins	spection			Report no	3188D-01	.2016.	ac
Subject of noncon	formity	Documentation	Std or reg	. Art. nr	. NOP 20)5.272(a)	NCR No	2016.	2
Inspection Date	•	07.10.2016					•		
Date of Notificati	on	17.10.2016			[Due Date		17.11	1.2016
	□м	ajör		■ Minör					
☐ Factors causing ris	sk on the pro	oduct		☐ Facto	rs causing	g no risk on t	the conditio	n of th	e product.
☐ Use of inputs whi	ns.	■ Produ	iction pro	cess plan pa	rtly implem	ented.			
☐ Non-Organic prod	duct sales as	organic.							
☐ Requirements of i									
☐ Frequent minor n regulation.	rement of								
☐ Customer compla actions, or complain									
☐ Misuse of the licenses and certificates									
☐ Production proces	ss plan not ir	mplemented.							
		Description of	of Nonco	nformit	y by Ins	spector			
§205.272 Comming	gling and con	tact with prohibited su	bstance pre	evention	practice s	tandard.			
	_	anic handling operation					prevent the	e comn	ningling of organic
	•	sport companies about		-			place		
Inspector Name a signature	nd	(b) (6), (b) (7)(C)	Operato	or name	and sign	nature	Alexey Ka	ichkov	rskiy
	Corrective Action Plan by Operator								
1						1			
Target date 12	2.11.2016	Operator name and signature	Alexey I	Kachkov	skiy	Actual C date	ompletior	1	
	Vaniti -	ation of Occupations			اسمدا امما		. h., FTV^		
		ation of Operator's o	1	action a			n by EIKO		
Accepted: YES Explanations:	□ NO	□ Date			ETKO	approval			
LAPIANACIONS.									

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notification of Non-Compliances_ VIP Group 3188D-01

Date: Monday, October 17, 2016 3:51:39 AM

Attachments: <u>image001.jpg</u>

3188D-01 VIP Group - GP 18 F 10 Notification of Noncompliance NONC.PDF

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for VIP Group 3188D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.org, Web: www.etko.org

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

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: (b) (6)

Subject: Notification of Resolution of Non-Compliances_ VIP Group 3188D-01

Date: Wednesday, January 18, 2017 10:39:54 AM

Attachments: <u>image001.jpg</u>

image001.jpg NRONC 3188D-01 VIP Group.pdf

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for VIP Group 3188D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

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

Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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Notification of Noncompliance

3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/3

Date: 20.12.2016

Dear Madam / Sir: Alexey Kachkovskiy

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

USDA National Organic Program

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **17.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **12.12.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

Sincerely

Sincerely

Cc: NOP appeals team <u>NOPACAAdverseActions@ams.usda.gov</u>

Result of Evaluation:

Closed noncompliance: 2

NC number(s): **2016.1**, **2016.2 See below forms.**

Outstanding noncompliance : None

NC number(s):

Notification of Noncompliance 3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/3

Outstanding Non-compliances	Οι	utstar	nding	Non-	com	olian	ces:
------------------------------------	----	--------	-------	------	-----	-------	------

0		, p									
Operator unit	no.	3188	3D-01		Unit n	ame	VIP Gr	oup			
Location - Adre	es	9, B	oryspilska str	., Kyi	v, Ukra	aine					
Initial Inspecti	on		Surveilland	e Ins	pection	า ■		Report no	3188D-01	.2016	5.ac
⊔			1								
Subject of non	conformity	D	ocumentatio	n !	Std or	reg. Art. nı	NOP 2	205.201(a1	NCR No	2016	5.1
Inspection Da	te		07.10.2016						•		
Date of Notifi	cation		17.10.2016					Due Date		17.1	1.2016
☐ Majör							■ Minör				
☐ Factors causing risk on the product				☐ Facto	rs causi	ng no risk on	the conditio	n of t	he product.		
☐ Use of inputs	which are no	allow	red by the regu	lation	ıs.	■ Produ	uction pr	ocess plan p	artly implem	ented	d.
☐ Non-Organic	product sales	as org	anic.								
☐ Requirements	s of regulation	or sta	andard not ap	plied							
☐ Frequent min regulation.	or non-confo	mitie	s on the same	equir	ement o	of					
☐ Customer con actions, or comp					emedial						
☐ Misuse of the	☐ Misuse of the licenses and certificates										
☐ Production process plan not implemented.											
Description of Nonconformity by Inspector											
§205.201 Organic production and handling system plan.											
label, or represe group(s))" must accredited certif	(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:										
performed;	•										•
Issue: A5.3 Re		1111 0	complaints	ana r	egistel	are prese	ntea bl	at there is r	o compiali	ıı pro	oceaure
Inspector Nam signature	ne and	(b	(6), (b) (7)(0	C)	Oper	ator name	and sig	gnature	Alexey Ka	chko	vskiy
Corrective Action Plan by Operator											
Complaint procedure and registration form of complaints are to be sent.											
Target date	17.11.201	5	Operator na		Alexe	ey Kachkov	skiy	Actual (Completion)	12.12.2016
•											
	Veri	ficatio	on of Operate	or's c	orrecti	ve action a	and imp	lementatio	n by ETKO		
Accepted:	YES I	NO 🗆		Date		19.12.201	ETK) approval	Musta	fa AK	YÜZ
Complaint procedure and registration form of complaints were provided. (See Annex-3)											

Notification of Noncompliance 3188D-01 VIP Group

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	3/3

Operator unit r	10.	3188	D-01 Unit name VIP Group							
Location - Adre	S	9, Bo	oryspilska str., K	yiv, Ukra	ine					
Initial Inspectio	n		Surveillance Ir	spection	ı =		Report no	3188D-01	201 6	5.ac
Cubicat of none		Τ.		Std or i	·ρα Δrt nr	NOP 1	205.272(a)	1		
	expection Date						203.272(a)	NCR No	2016	0.2
Date of Notific			07.10.2016				Due Date		17.1	1.2016
		Maj	17.10.2016					Minör	17.1	11.2010
		viuj								
☐ Factors causing	g risk on the	produ	ct		☐ Facto	rs causi	ng no risk on	the condition	on of t	he product.
☐ Use of inputs v	vhich are no	t allow	red by the regulati	ons.	■ Produ	uction pr	ocess plan pa	artly implen	nented	i.
☐ Non-Organic p	roduct sales	as org	anic.							
			andard not applie							
Frequent minor non-conformities on the same requirement or regulation.										
☐ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.										
☐ Misuse of the licenses and certificates										
☐ Production pro	cess plan no	t impl	emented.							
			Description	of None	conformit	y by Ir	nspector			
§205.272 Comm	ingling and o	contac	t with prohibited s	ubstance	prevention	practice	standard.			
1 1		_	c handling operation					prevent th	e com	mingling of organic
			rt companies abo		•			place.		
		•	·		J	ŭ				
Inspector Name	e and							Alan **		
signature		(b) (6), (b) (7)(C)	Oper	ator name	and sig	gnature	Alexey K	acnko	vskiy
Corrective Action Plan by Operator										
Instructions for transport companies about transportation organic goods are to be sent.										
Target date	17.11.201	•	Operator name and signature	Alexe	y Kachkov	skiy	Actual C	Completio	n	12.12.2016
			on of Operator's	correcti	ve action a	nd imp	olementatio			
		0 🗆	Dat				O approval	Musta		
Explanations: Instructions for transport companies about transportation organic goods and a Declaration on this issue were provided. (See Annex 1 and 2)										

Notification of Noncompliance

3216F-94 Volum Agra-

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	1/2

Dear Madam / Sir: Shum Pavlo N kolajových

Date: 01.06.2016

On the dates (12-13.05.2016) | TKO Inspector (b) (6), (b) (7)(C) realized a initial inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated 12-13.05.2016 ETKO determined the outstanding noncompliances in your operation(s)

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

 Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.

Or

Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than 01.07.2016 (in 30 days, starting from the date of this notification:

ETKO 1© Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to M - $M_{\rm L}$

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team <u>NOPACAZ Versez nu visuala ms. usbalagos</u>

Notification of Noncompliance

3216F-04 Volyn Agro

Nr	GP 18 F 10
Date	15.07.2015
Rev	00
Page	2/2

Noncompliances:

Britan Walter Britain -

					140.43.0F.304.0
Noncompliance No	1	Major 🗌	Minör 🔀	Inspection Date	12-13.05.2016
	0:	1.06.2016			01.07.2016
Date of Notification)			Due Date	
(1) Nonorganically produc variety is not commercially	organically grown ed, untreated see y available: Except	seeds, annual seedlings, and	ised to produce a sed must be used	n organic crop when for the production o	an equivalent organically produced fedible sprouts;
					834-Article 9, IACB 5.9
Inspection	NOD	205.204a(1)		ETKO rules ref.	834-Article 9, IACB 3.9
criteria Action taken	NOP reg. re	T		Tel.	
Name, Surname ar	nd	nts, if any: 3216F-04 Volyn Ag Sham Pavlo Mykolaiow		aration com, 3216F-0 Date	4 Volyn Agro - Vendor declaration rapeseed 5.06.2016
Signature of Appl.	Resp.	(D)			
Review Date				R	esolved
			<u> </u>	U	Inresolved
Review Comment:	V				

From: <u>Ceren BAYAZIT</u>

To: <u>sm.ms.NOPACAAdverseActions</u>

Cc: <u>ma@etko.org</u>; <u>fa@etko.org</u>; <u>volunagro@gmail.com</u>

Subject: Notification of Non-Compliances & Resolution- VolynAgro 3216F-04

Date: Thursday, August 18, 2016 8:56:38 AM

Attachments: <u>image001.jpg</u>

NRONC 3216F-04 VolynAgro.pdf

3216F-04 VolynAgro - GP 18 F 10 Notification of Noncompliance NONC.pdf

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances & Resolution for VolynAgro 3216F-04 (a farm of Sayvo 3216D-01). If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07 Email/eposta: cb@etko.org, Web: www.etko.org

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files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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Notification of Resolution of Noncompliance 3216F-04 VolynAgro

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
Page	1/2

Date: 18.08.2016

Dear Madam / Sir: Shum Pavlo Mykolajovych

On the date (12-13.05.2016) ETKO Inspector (b) (6). (b) (7)(C) realized an initial inspection to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:

ma@etko.org info@etko.org .

Sincerely Mustafa Akyüz

Cc: NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

Closed noncompliance: 1

NC number(s): 1. See below forms

Outstanding noncompliance : None NC number(s) :

Notification of Resolution of Noncompliance 3216F-04 VolynAgro

Nr	GP 18 F 11
Date	15.07.2015
Rev	00
Page	2/2

Resolved Noncompliances:

Noncompliance No	1	Major 🗌 🛮	Minor 🛚	Inspection Date	12-13.05.2016	
	01.06	.2016			01.07.2016	
Date of Notification				Due Date		
Noncompliance: §205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: <i>Except</i> , That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: <i>Except</i> , That, organically produced seed must be used for the production of edible sprouts;						
There are no vendor declar	rations for rapes	eeds and corn (risky G	GMO crops in Ukr	aine)		
Inspection		205.204a(1)		ETKO rules	834-Article 9, IACB 5.9	
criteria NO	OP reg. ref			ref.		
				·	endor declarations). 3216F-04 Volyn Agro - Vendor	
	Shu	m Pavlo Mykolajovy	ych	05	3.06.2016	
Name, Surname and				Date		
Signature of Appl. Resp						
Review Date	18.08.2016			Re	esolved 🖂	
				Ur	nresolved 🗌	
Review Comment: Vendor Declarations for corn and rapeseed are attached. Suppliers of seeds declared that their seeds are not GMO. Reviewer name & signature: Fatih Aksoy						

From: Mann, Renee - AMS

To: Claypool, Rebecca E - AMS; Mann, Renee - AMS
Subject: Conversation with Claypool, Rebecca E - AMS
Date: Tuesday, September 27, 2016 3:45:42 PM

Mann, Renee - AMS 3:31 PM:

(b) (5)

. Again, you're providing a draft response to

us first. Just confirming.

Mann, Renee - AMS 3:35 PM:

And we are going to send it through Miles, because it's a bit touchy.

Claypool, Rebecca E - AMS 3:42 PM:

SUre thing. RGK just pulled me away for a question, but I'm working on a draft and will send to you and Cheri first.

Mann, Renee - AMS 3:43 PM:

thxx

*thanks

From: Claypool, Rebecca E - AMS

To: Claypool, Rebecca E - AMS; Mann, Renee - AMS
Subject: Conversation with Claypool, Rebecca E - AMS
Date: Tuesday, November 01, 2016 3:42:38 PM

Claypool, Rebecca E - AMS 3:39 PM:

Hi Renee, Sorry to bug you. The 2 witness audits assigned to me for ETKO - Can they be combined into one NC report or keep them separate?

Mann, Renee - AMS 3:39 PM:

There should only be one... right? Are there two different audit IDs?

Claypool, Rebecca E - AMS 3:40 PM:

Same Audit IDs two different witness audits. I ask because I think I got 2 auto emails via workload tracking.

Mann, Renee - AMS 3:40 PM:

i think it's just 2 emails. When you go into the WTL does it show two lines or one?

Claypool, Rebecca E - AMS 3:42 PM:

Una!

Uno

Mann, Renee - AMS 3:42 PM:

yeeah - just weirdness with the database. IT's just one Witness Audit.

Claypool, Rebecca E - AMS 3:42 PM:

bueno!

From: Mann, Renee - AMS

To: Swartwood, Stacy - AMS; Mann, Renee - AMS
Subject: Conversation with Swartwood, Stacy - AMS
Date: Thursday, December 22, 2016 2:44:29 PM

Mann, Renee - AMS 2:21 PM:

Where's the best place for me to view the current NOP certificate INTEGRITY issues?

Swartwood, Stacy - AMS 2:22 PM:

In terms of feedback or status of development activities?

Mann, Renee - AMS 2:22 PM:

Oh not even that complicated. I just want to see the template.

Whatever the current one is.

Swartwood, Stacy - AMS 2:23 PM:

Hmmm...probably in the Development or Test environment of the database

You can get into Dev at http://172.16.1.186/OID/Default.aspx

We've currently got VOF generating certificates, so you can pick the first operation in the list, and then select the "Print Certificate" link in the upper right corner of the Operation Profile

(clarification - VOF is not using the certificate module IRL, we just have them set to generate in the Development environment)

BTW - we are working on bunches of enhancements to the certificates module, like preview and download batches of certificates

Mann, Renee - AMS 2:26 PM:

ah thanks

Swartwood, Stacy - AMS 2:28 PM:

Is there a specific question I can help answer? This is one of our epic efforts, so there are lots of aspects to it. Mann, Renee - AMS 2:29 PM:

no, but thanks. It's not really related to what you're up to. ;-)

(b) (5)

Swartwood, Stacy - AMS 2:29 PM:

Okaaay...

(b) (5)

I'll get that to you in just a sec (we posted it for feedback)

Mann, Renee - AMS 2:31 PM:

ooooo. let me show you then.

GP 18 F 21 NOP Certificate 20161118.pdf

(b) (5

Ugh, sorry. Just go to the last link and then click on the PDF called "GP 18 F 21 NOP Certificate..."

Swartwood, Stacy - AMS 2:32 PM:



Mann, Renee - AMS 2:35 PM:

Is that a version of one of the certificates we've showed the certifiers? Or did they modify it?

Swartwood, Stacy - AMS 2:35 PM:

(b) (5) Here's what we have available as a sample (one sec while I track down the URL)

Mann, Renee - AMS 2:36 PM:

k

I did just pull up the VOF one and it is quite modified.

Swartwood, Stacy - AMS 2:36 PM:

from their website?

talk about opening up a can of worms!

https://www.cloudvault.usda.gov/index.php/s/soCcXCvf6Xdt5Uf

Mann, Renee - AMS 2:37 PM:

Are you here in the office?

Swartwood, Stacy - AMS 2:37 PM:

no sorry ... telework

Mann, Renee - AMS 2:38 PM:

ha ok.

Swartwood, Stacy - AMS 2:38 PM:

i have a telephone...

Mann, Renee - AMS 2:38 PM:

What's your number?

Swartwood, Stacy - AMS 2:38 PM:

(b) (6)

Mann, Renee - AMS 2:40 PM:

ok, just a second

Swartwood, Stacy - AMS 2:41 PM:

(call)

Mann, Renee - AMS 2:43 PM:

(call)

From: <u>Lars Crail</u>

To: <u>Lars Crail; Mann, Renee - AMS</u>
Subject: TDA Finding Examples

Date: Wednesday, January 11, 2017 9:55:50 AM

Lars Crail 9:49 AM:

Renee, I saw that the meeting with Tammy was rescheduled for this afternoon. I have a video meeting with a certifier at 12:00 pm, so I wanted to alert you that I may a little late in joining your meeting.

Mann, Renee - AMS 9:49 AM:

that's fine. I'm not even sure if it's happening. I've been having a hard time connecting with Tammie.

Lars Crail 9:50 AM:

I very much need to know whether I should schedule exporter visits in Istanbul other than those certified by ETKO.

The security situation in Istanbul is elevated and the RSO in the Turkey embassy is wanting more details of my activities.

Mann, Renee - AMS 9:52 AM:

ok. If Tammie isn't available today, you and I can talk. I can show you what she's found. And we could include Kay, who might be knowledgeable on the stuff Tammie has found.

Lars Crail 9:52 AM:

good. Thanks.

From: RPost

Γο: <u>Mann Renee - AMS</u>

Subject: Ack: Annual Report Acknowledgement Date: Acknowledgement 10, 2014 10:38:42 AM

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Cc:	
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Network ID:	<3C4DB283706AA94CB746BB337C77BE7430FB75@001FSN2MPN1-043.001f
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An RPost Service

From: Mann, Renee - AMS
To: ma@etko.org

Subject: Annual Report Acknowledgement (Sent Registered)

 Date:
 Monday, March 10, 2014 10:38:01 AM

 Attachments:
 ETKO AnnRptAckn MMK 031014.pdf

Dear Dr. Akyuz:

Thank you for the submission of your annual report. The USDA National Organic Program has reviewed your report and found that ETKO has adequately complied with the annual reporting requirement. Please contact me with any questions you may have.

Sincerely, Renee

Ms. Renee Mann
Accreditation Manager
USDA National Organic Program
(202) 260-8635 (Note new phone number)
NOP website

Sign up for our newsletter, the <u>USDA Organic Insider</u>.



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

NOTICE OF ANNUAL REPORT

1 0 MAR 2014

Dr. Mustafa Akyuz Ecological Farming Control Organization Merkez ofis 160 sk No: 13/7 Bornova - Izmir, 35040 TURKEY

Dear Dr. Akyuz:

On January 23, 2014, the United States Department of Agriculture (USDA), National Organic Program (NOP) received the 2014 annual report from Ecological Farming Control Organization (ETKO). The NOP reviewed the report materials submitted and determined that ETKO has adequately complied with the annual reporting requirement (§ 205.510(a)). The report information will be verified during your next onsite audit.

If you have questions regarding this notice, please contact your Accreditation Manager, Renee Mann, at Renee.Mann@ams.usda.gov or (202) 260-8635.

Sincerely,

Cheri Coudney
Cheri Courtney

Director, Accreditation and International Activities

National Organic Program

 From:
 Lusby, MaryLou - AMS

 To:
 Essiq, Mario - AMS

 Cc:
 Mann, Renee - AMS

Subject: Changes to ETKO address, State or Foreign countries in which they certify, and List of Certified Operations

Date: Friday, February 06, 2015 2:22:57 PM

Attachments: ANNEX 7 ETKO Certified Operators List 2014.OK.pdf

image001.pnq

Mario.

Changes below came from ETKO Annual Report that they submitted for 2015. Not sure how the changes are handed but they are below.

ETKO moved to a different location (Door number changed) but there are in the same building that they were in. (See Below)

This might require changes on the website

Any updates to the list of State or foreign countries in which the certifying agent certifies production and handling operations and a list of each State or foreign country in which the certifying agent intends to certify production or handling operations.

\$205.504 Evidence of expertise and ability

Azerbaijan, Belarus, Bengladesh, Cote D'Ivoire, Cyprus, Egypt, Ethiopia, Georgia, India, Kazakhstan, Kirgizia, Korea, Pakistan, Romania, Russia, Serbia, Singapur, Tacikistan, Thailand, Turkey, Ukraine and Uzbekistan

Also have enclosed there List of Certified Operations the one highlighted belongs on the list (See below)

If you have any questions please let me know.

Thank you

Mary Lou Croisetiere



Mary Lou Croisetiere | Program Specialist, National Organic Program

USDA AMS | 100 Riverside Parkway Suite 101 Fredericksburg VA 22406 540-361-2712

MaryLou.Lusby@ams.usda.gov

From: ma@etko.org [mailto:ma@etko.org]
Sent: Friday, February 06, 2015 1:52 PM

To: Lusby, MaryLou - AMS

Subject: RE: ETKO Annual Report 2014-5

Ms Lusby

The address was changed as following: 160 Sokak 13/3, 35100 Bornova – Izmir.

The door number changed, we moved in the same building to another flat.

Yellow indication was simply forgotton, the client is certified. Yellow color shuld have been cleaned,

but forgotton

Have a nice weekend,

Mustafa Akyuz

ETKO Certified Operators List 2014

No	License number	Name client	Area Certification	Nr of Handlers	Nr of Producers	Nr of Collectors	Date of Certification 2014
	I we		N. C. C. C. C. C. C. C. C. C. C. C. C. C.				
1	2009	Arisu – TURKEY	Processing	1	7.1		30.12.2014
2	2014	Mezo – TURKEY	Processing & crops and wild collection	1	15		30.12.2014
3	2044	Arif Gurdal – TURKEY	Crops	1	(4)		30.10.2014
4	2058	ETAP – TURKEY	Processing	1			30.12.2014
5	2070	Ozpa - TURKEY	Processing & crops	1			31.12.2014
6	2120	Treko – TURKEY	Processing & crops	1	360		20.11.2014
7	2158	Susitas – TURKEY	Processing & wild collection	1			30.12.3014
8	2190	Asya – TURKEY	Processing	1			24.09.2014
9	2203	Kalkan – TURKEY	Crops	1	74		30.12.2014
10	2314	Fine Food – TURKEY	Processing & crops	1			02.09.2014
11	2328	Taskin – TURKEY	Processing	1			30.12.2014
12	2387	Ares - TURKEY	Processing	1			31.07.2014
13	2391	Vahap Baran Baydoğan- TURKEY	Crops				12.12.2014
14	2453	Oliva Gida Sanayi Tic.Ltd.Şti- TURKEY	Processing & crops	1			25.12.2014
15	2475	Mevsan - TURKEY	Processing & crops	3	35		30.12.2014
16	2484	Meysüt - TURKEY	Processing	2			26.09.2014
17	2508	Kalkan Organik - TURKEY	Processing				30.12.2014
18	2516	Arın Gıda - TURKEY	Trade				01.11.2014
19	2527	Limkon – TURKEY	Processing	1			20.11.2014
20	2534	WBT – TURKEY	Processing	1			05.04.2014
21	2542	Ekoturka-TURKEY	Processing	2	21		18.02.2014
22	2573	Cafer Ipek-TURKEY	Crops	1			19.07.2014
23	2629	Bio Naturel-TURKEY	Processing & crops				14.07.2014
25	2633	Ason-TURKEY	Processing		1		13.05.2014
26	2650	Dohler Marmara-TURKEY	Processing	1	1		07.12.2014
26 27	2654	Nigella-TURKEY	Processing	1			07.11.2014
28	2669	GKM-TURKEY	Processing	2		1	16.12.2014
29	3006	Spelta – UKRAINE	Trade	-	5		30.12.2014
30	3013	Alef Ltd.	Trade		10		15.12.2014
31	3020	Region Agro Itd.	Trade		10		20.10.2014
32	3026	Sibnut – RUSSIAA	Processing and wild collection	2		15	23.10.2014
33	3076	UFC – UKRAINE	Trade	-	5	15	30.12.2014
34	3077	TOO "PROIZVODSTVENNIY KOMPLEX "MOL-TABYS"	Trade		3		30.12.2014
35	3087	Yugekotop – UKRAINE	Processing and crops	15	11		31.12.2013
36	3090	EVERI LTD.	Trade	P	9		15.09.2014
37	3092	GRAINAGRO LTD	Trade	F 6	8		09.12.2014
38	3093	Dnepr2 – UKRAINE	Trade	-	12	_	05.10.2014
39	3094	Polba – UKRAINE	Trade	-	4	- 2	30.12.2014
40	3096	El Dorado – UKRAINE	Trade	- L	0		30.12.2014
41	3114	Farmeks – TURKEY	Trade	7	19		30.12.2014

42	3120	Sadeko Organic – UKRAINE	Trade	-	4	-	17.10.2014
43	3121	Ekoturka- ETHIOPIA	Crops	-	82	-	30.12.2014
44	3122	Do Cotton – TAJIKSTAN	Crops	-	103	=	30.12.2014
45	3126	Ekoturka- KIRGIZIA	Crops	1	4	-	30.12.2014
46	3127	Ekoturka- KAZAKHSTAN	Crops	1	20	-	30.12.2014
47	3128	Ekoturka-RUSSIA	Crops	1	4	-	30.12.2014
48	3140	Prodexim-UKRAINE	Trade	-	7	-	30.10.2014
49	3141	Ekolium – UKRAINE	Trade	-	-	-	27.11.2014
50	3142	Seomjingang Rose Farm – KOREA	Crops	-	17	-	29.12.2014
51	3149	Janghueng Musangim Co Ltd - KOREA	Crops	1	7	-	29.12.2014
52	3170	NT-NOVA LTD	Trade	-	-	-	25.08.2014
53	3172	ART SEED ltd.	Trade	-	4	-	29.09.2014
54	3180	KAZECOTRADE LTD.	Trade	-	4	-	15.12.2014
55	3193	OJSC Vinnytsa Oil-and-Fat-Production	Processing	1	-	-	27.11.2014
		Plant	_				
56	3194	LLC NIKMORSERVICES NIKOLAEV	Trade	-	-	-	28.11.2014
57	3195	AGRO SUPPLIES LLC.	Trade	-	-	-	28.11.2014

ETKO Sanctioned & Surrendered operations in 2014 season

License number Name Operator Comment
3132 RODINA Llc. Surrendered
3138 DAEHAN FEED Surrendered

Name, address of operators production and processing units and products

1- 2009 ARISU

Processing units

Uni	it nr	Unit	Process	Address
2009D-0	01	Arisu Gida	Production and Export Of Organic Fruit Purees and Concentrates	Civril – Denizli / TURKEY
		Dis Ticaret A.S.		

Products from other project

Product nr	Product	Final product	Expected or realized harvest (ton)	Status	Processing unit
2009P-01	Apricot	Fresh		Org	2009D-01
2009P-02	Apple	Co		IC 1	2009D-01
2009P-03	Apple	Co		IC 2	2009D-01
2009P-04	Apple	Co		IC 3	2009D-01
2009P-05	Apple	Co		Org	2009D-01
2009P-06	Strawberry	Co		Org	2009D-01
2009P-07	Cherry	Co		Org	2009D-01
2009P-08	Plum	Pu		Org	2009D-01
2009P-09	Pomegranate	NFC, JU		Org	2009D-01

AR: Aroma, Co: Concentrate, Pu: Puree Ju:Juice

2-2014 MEZO

Processing units:

Unit nr	Unit	Process	Address
2014D-01	Mezo	Production and processing dried herbs, export, storage,	Antalya Org. San. Bol. 2. cad. WBT Tesisleri - Yenikoy - Antalya

Agricultural units:

Ünit No	Unit name	Number of producers, hectar and crop	Status
2014F-10	Tefenni / BURDUR	7 üretici, (b) (4) ha. rezene, anason, fiğ, nohut, buğday, arpa	Org
2014F-10	Tefenni / BURDUR	3 üretici, (b) (4) ha. rezene, anason, arpa, şeker pancarı, slajlık mısır,	IC2
		hiyar, domates, biber	
2014F-04	Antalya, Burdur, Mersin	7 üretici, Doğal toplama	Org

Products:

Product no	Name product	Last product	Status	Process no
2014P-01	Fennel	Dane	Organic	2014D-01
2014P-02	Wheat	Dane	Organic	2014D-01
2014P-03	Vetch	Dry ot	Organic	2014D-01
2014P-04	Barley	Dane	Organic	2014D-01
2014P-05	Chickpea	Dane	Organic	2014D-01
2014P-06	Anise	Dane	Organic	2014D-01
2014P-07	Ball Oregano - Oregano	Dry Leaves	Organic	2014D-01
2014P-08	Thyme - Savory	Dry Leaves	Organic	2014D-01
2014P-09	Sage	Dry Leaves	Organic	2014D-01
2014P-10	Bay	Dry Leaves	Organic	2014D-01
2014P-11	Rosemary	Dry Leaves	Organic	2014D-01
2014P-12	Myrtle leaf	Dry Leaves	Organic	2014D-01
2014P-13	Sumac	Dane	Organic	2014D-01
2014P-14	Carrageenan	Dry Leaves	Organic	2014D-01
2014P-15	Vitex agnus-castus	Dry Leaves	Organic	2014D-01
2014P-16	Locust	Fruit	Organic	2014D-01

3-ARIF GURDAL

Agricultural units:

Agriouiturui unito.			
Unit nr	Unit	Total area, crops and farmers	Status
2044F-01 AG Organic Farm Facility	Aydın Baltaköy	1 producer, (b) (4) ha. Crops: Pomegranate.	Organic
2044F-01 AG Organic Farm Facility	Aydın İncirliova, H.Aliobası	1 producer, (b) (4) M ² . Crops: Pomegranate.	Organic
2044F-01 AG Organic Farm Facility	Koçarlı Kanlıazmak Mvk	1 producer, (b) (4) M ² . Crops: Pomegranate.	Organic

Processing units:

Unit nr	Unit	Process	Address
2044D-01	Arif Gurdal Organic Farm Facility	Documentation, Organisation, Marketing, Animal	Hamzabali Mevkii Baltakoy Vedat Ciftci Ciftligi Cine Yolu
		Farming.	8.km, AYDIN-TURKEY

Products

Product nr	Product	Final product	Status	Processing unit
2044P-01	Pomegranate	Fresh	ORG	2044D-01
2044P-02	Pomegranate	Fresh	In-Con	2044D-01

4-ETAP GIDA

Processing units:

Unit nr	Unit	Process	Address
2058D-01	Anadolu Etap Tarim & Gida	Marketing and processing of fruit juice,	Mersin – Tarsus Karayolu 10. km. Kazanli
	Ürunleri Ambalaj San. Tic. A.S.	fruit juice concentrate, puree, transporting, and	Kavsagi, Mersin / TURKIYE
		documentations.	

Agricultural units:

-g			
Unit nr	Unit	Total area, crops and farmers	Status
None			

Product nr	Product	Final product	Status	Processing unit
2058P-01	Apple	Juice concentrate, puree	Organic	2058D-01
2058P-02	Apricot	Puree,20-22 bx,30-32 bx	Organic	2058D-01
2058P-03	Banana	Puree	Organic	2058D-01
2058P-04	Black carrot	Juice concentrate	Organic	2058D-01
2058P-05	Blackberry,	Puree	Organic	2058D-01
2058P-06	Black mulberry	Puree	Organic	2058D-01
2058P-07	Fig	Puree	Organic	2058D-01
2058P-08	Grape	Juice	Organic	2058D-01
2058P-09	Grapefruit	Juice concentrate, cloudy conc., peel oil and cell	Organic	2058D-01
2058P-10	Lemon	Juice concentrate, cloudy conc., peel oil and cell	Organic	2058D-01
2058P-11	Mandarin	Juice concentrate	Organic	2058D-01
2058P-12	Orange	Juice concentrate, cloudy conc., comminuted, peel oil and cell	Organic	2058D-01
2058P-13	Peach	Puree,20-22 bx,30-32 bx	Organic	2058D-01
2058P-14	Pear	Concentrate	Organic	2058D-01
2058P-15	Plum	Puree,20-22 bx,30-32 bx	Organic	2058D-01

2058P-16	Pomegranate	Juice, Concentrate	Organic	2058D-01
2058P-17	raspberry	Puree	Organic	2058D-01
2058P-18	Red beet	Juice concentrate	Organic	2058D-01
2058P-19	Sour cherry	Concentrate, puree	Organic	2058D-01
2058P-20	Strawberry	Puree	Organic	2058D-01
2058P-21	Tomato	Puree	Organic	2058D-01

5-2070 ÖZPA Processing units:

Unit nr	Unit	Process	Address
2070D-01	ÖZPA GIDA TARIM HAYVANCILIK İNŞ. SAN. ve TİC. A.Ş.	Production, documentation and marketing,	Cumhuriyet Köyü Yıldırım Çiftliği Mah. ÖZPA Tarım İşletmesi Eskisehir/ TURKEY

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
2070F-01	ÖZPA GIDA TARIM HAYV.	1 producer, total area hectares. Organic Summer and Winter Vegetables,	Organic
	İNŞ. SAN. ve TİC. A.Ş.	Fruits Productions.	

Product nr	Product	Final product	Status	Processing unit
2070P-01	Almonds	Fresh	Organic	
2070P-02	Apple	Fresh	Organic	
2070P-03	Apricot	Fresh	Organic	
2070P-04	Bell pepper	Fresh	Organic	
2070P-05	Blackberry	Fresh	Organic	
2070P-06	Celery	Fresh	Organic	
2070P-07	Cherry	Fresh	Organic	
2070P-08	Cucumber	Fresh	Organic	
2070P-09	Eggplant	Fresh	Organic	
2070P-10	Garlic	Fresh	Organic	
2070P-11	Golden berry	Fresh	Organic	
2070P-12	Grapes	Fresh	Organic	
2070P-13	Leek	Fresh	Organic	
2070P-14	Melon	Fresh	Organic	
2070P-15	Mulberry (Black-white)	Fresh	Organic	
2070P-16	Okra	Fresh	Organic	

2070P-17	Onion	Fresh	Organic	
2070P-18	Parsley	Fresh	Organic	
2070P-19	Peach	Fresh	Organic	
2070P-20	Pears	Fresh	Organic	
2070P-21	Pepper	Fresh	Organic	
2070P-22	Plum	Fresh	Organic	
2070P-23	Potato	Fresh	Organic	
2070P-24	Pumpkin	Fresh	Organic	
2070P-25	Quince	Fresh	Organic	
2070P-26	Raspberries	Fresh	Organic	
2070P-27	Red Pepper	Fresh	Organic	
2070P-28	Sour Cherry	Fresh	Organic	
2070P-29	Squash	Fresh	Organic	
2070P-30	Tomato	Fresh	Organic	
2070P-31	Walnut	Fresh	Organic	
2070P-32	Watermelon	Fresh	Organic	

6-2120 TREKO

Processing units:

	~ !			
Unit nr	Unit	Process	Address	
2120D-01	Treko Tarim Gida Ic ve Dis	Documentation, organization, marketing, export	Ali Cetinkaya Bulvari No: 34 K: 4 D: 401 Alsancak - Izmir	
	Ticaret Ltd. Sti.		/ TURKEY	
2120D-02	Limkon Gıda San. ve Tic.	Documentation, Export, Fruit juice concentrate,	Adana Hacı Sabancı Organize Sanayi Bölgesi Adana-	
	A.Ş.	Import & Export of organic products, marketing	Ceyhan Yolu Üzeri 28. Km Yakapınar – Adana / Türkiye	

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
2120F-04	Çankırı	267 farmers, (b) (4) Hectares Apple productions	Organic
2120F-05	Alaşehir	104 farmers (b) (4) Hectares Apple productions	Organic
2120F-06	Çine	13 farmers, (b) (4) Hectares Apple productions	Organic

Product nr	Product	Final product	Status	Processing unit
2120P-01	Apple	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2120D-02

2120P-02	Pears	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2120D-02
2120P-03	Quince	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-04	Pomegranate	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-05	Grapefruit	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-06	Orange	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-07	Lemon	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-08	Mandarin	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-09	Carrots	Concentrate, Aroma		2120D-02
2120P-10	Black Carrots	Concentrate, Aroma		2120D-02
2120P-11	Strawberry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-12	Sour Cherry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-13	Cherry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-14	Tomato	Concentrate, Puree, Aroma		2120D-02
2120P-15	Apricot	Concentrate, Puree, Aroma		2120D-02
2120P-16	Peaches	Concentrate, Puree, Aroma		2120D-02

7-SUSİTAŞ

Processing units:

	.		
Unit nr	Unit	Process	Address
	SUSİTAŞ su ürünleri ve san.	Documentation, organization of collectors,	AOSB 10040 sk. No:25 Çiğli-İzmir
	mamülleri ihracat tic. a.ş.	canning of capers.	

Agricultural units:

g	-		
Unit nr	Unit	Total area, crops and farmers	Status
2158F-01	Manisa	(b) (4) ha, capers, 4 chief collectors	Org

Product nr	Product	Final product	Status	Processing unit
2158P-01	Capers	*Canned (in jars, tins, pet buckets, gallons, barrels)	Org	2158D-01

8-2190 ASYA MEYVE SULARI

Processing units:

Unit nr	Unit	Process	Address
2190D -01	Asya Meyve Suyu ve Gıda Sanayi A.Ş.	Processing of Fruit juice	Tepeli Köyü Mevkii – Eğirdir
		concentarate and puree	/ ISPARTA

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status

Products:

Product nr	Product	Final product	Status	Processing unit
2190P-01	Apple	Concentrate	Organic	2190D-01
2190P-02	Apple	Puree	Organic	2190D-01
2190P-03	Sour Cherry	Concentrate	Organic	2190D-01
2190P-04	Pomegranate	Concentrate	Organic	2190D-01
2190P-05	Peach	Concentrate	Organic	2190D-01
2190P-06	Peach	Puree	Organic	2190D-01
2190P-07	Apricot	Concentrate	Organic	2190D-01
2190P-08	Apricot	Puree	Organic	2190D-01
2190P-09	Strawberry	Concentrate	Organic	2190D-01
2190P-10	Strawberry	Puree	Organic	2190D-01
2190P-11	Black carrot	Concentrate	Organic	2190D-01
2190P-12	Pear	Concentrate	Organic	2190D-01
2190P-13	Quince	Concentrate	Organic	2190D-01
2190P-14	Plum	Puree	Organic	2190D-01
2190P-15	Cherry	Concentrate	Organic	2190D-01

9-2203 KALKAN

Processing units:

Ī	Unit nr	Unit	Process	Address
Ī	2203D - 01	Kalkan sebze Meyve Hay. Nak. Trz. İnş. San. Tic.	Processing (IQF), production, Organization,	Yeniköy – Akşehir/ KONYA
		Ltd. Şt.	freezing (IQF), marketing	

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2203F-01	Akşehir-Konya / TURKEY	74 producers, fruits production	Organic

Product nr	Product	Final product	Status	Processing unit
2203P-01	Strawberry	Fresh, IQF	Organic	2203D - 01
2203P-02	Cherry	Fresh, IQF	Organic	2203D - 01
2203P-03	Sour cherry	Fresh, IQF	Organic	2203D - 01
2203P-04	Apple	Fresh	Organic	2203D - 01
2203P-05	Pear	Fresh	Organic	2203D - 01
2203P-06	Plum	Fresh	Organic	2203D - 01
2203P-07	Grape	Fresh	Organic	2203D - 01

10- 2314 FİNEFOOD

Processing units:

Unit nr	Unit	Omitted Activity – Material	Justification
2314D-02	Fine Food A.Ş.	Processing (IQF), marketing, documentation,	Conventional Processing (IQF)
		organization	

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
2314F-01	Fine Food A.Ş.	1 producer, (b) (4) ha. Crops: Peas	Organic
		1 producer, (b) (4) ha. Crops: Beans	Organic
		1 producer, ha. Crops: Pepper CW	Organic

Procucts:

Product nr	Product	Final product	Status	Processing unit
2314P-01	Broccoli	IQF	Organic	2314D-01
2314P-02	Capia Pepper	IQF	Organic	2314D-01
2314P-03	Cherry	IQF	Organic	2314D-01
2314P-04	Corn	IQF	Organic	2314D-01
2314P-05	Green Pepper	IQF	Organic	2314D-01
2314P-06	Onions	IQF	Organic	2314D-01
2314P-07	Peas	IQF	Organic	2314D-01
2314P-08	Sour cherry	IQF	Organic	2314D-01
2314P-09	Strawberry	IQF	Organic	2314D-01
2314P-10	Tomatoes	IQF	Organic	2314D-01

11-2328TASKIN TARIM

Processing units:

Unit nr	Unit	Process	Address
2328D-01	Taşkın Tarım	Processing (Drying), Packing, Storing, Marketing and Export of	Gediz – Kütahya
		Organic Fruits	

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2328F-01	Kütahya	14 poducers, (b) (4) ha fruit productions	Organic

Product	Product	Final	Status	Processing
nr		product		unit
2328P-01	Pear	Dried	Organic	2328D-01
2328P-02	Quince	Dried	Organic	2328D-01
2328P-03	Almond	Shelled	Organic	2328D-01
2328P-04	Walnut	Shelled	Organic	2328D-01
2328P-05	Tomatoes	Dried	Organic	2328D-01
2328P-06	Apple	Dried	Organic	2328D-01
2328P-07	Plum	Dried	Organic	2328D-01
2328P-08	Figs	Dried	Organic	2328D-01
2328P-09	Apricot	Dried	Organic	2328D-01
2328P-10	Cherry	Dried	Organic	2328D-01
2328P-11	Rosehip	Dried	Organic	2328D-01
2328P-12	Lemon	Dried (skin or fruit)	Organic	2328D-01
2328P-13	Orange	Dried (skin or fruit)	Organic	2328D-01
2328P-14	Peach	Dried	Organic	2328D-01
2328P-15	Sour orange	Dried (skin or fruit)	Organic	2328D-01
2328P-16	Grape	Dried	Organic	2328D-01
2328P-17	Sour cherry	Dried	Organic	2328D-01

^{*:} Products will be bought from other projects as certified

12-2387 ARES

Agricultural units:

No	Unit name	Number of producers, hectare and crop	Status
None			

Processing units:

Ünit nr	Unit name	Process	Address
2387D-01	ARES ORGANİK GIDA TEK. SAN. Ve DIŞ TIC. LTD. ŞTİ.	Documentation, Marketing	Alntıntepe Mah. İstasyon yolu sok. No:3 Maltepe/ ISTANBUL - TURKEY

Product no	Name product	Last product	Status	Process no
2387P-01	Anise	Seed	Organic	2387D-01
2387P-02	Apple	Dried	Organic	2387D-01
2387P-03	Apricot	IQF, Dried, Kernel, Halves in (Water with syrup), Jam	Organic	2387D-01
2387P-04	Black Cherry (Red, Dark)	IQF	Organic	2387D-01
2387P-05	Blackberries	IQF, Jam	Organic	2387D-01
2387P-06	Blueberry	IQF	Organic	2387D-01
2387P-07	Boulghour	Grain	Organic	2387D-01
2387P-08	Broccoli	IQF	Organic	2387D-01
2387P-09	Carrot	IQF	Organic	2387D-01
2387P-10	Chestnut	Dried	Organic	2387D-01
2387P-11	Chickpeas	Pulses	Organic	2387D-01
2387P-12	Cumin	Seed	Organic	2387D-01
2387P-13	Fennel	Seed	Organic	2387D-01
2387P-14	Figs	Dried, Jam	Organic	2387D-01
2387P-15	Grapefruit	Segment in juice/syrup	Organic	2387D-01
2387P-16	Green lentil	Grain	Organic	2387D-01
2387P-17	Hazelnut	Dried	Organic	2387D-01
2387P-18	Laurel	Leaves	Organic	2387D-01
2387P-19	Leek	IQF	Organic	2387D-01
2387P-20	Linden	Leaves, Flowers	Organic	2387D-01
2387P-21	Mahleb	Seed	Organic	2387D-01
2387P-22	Mandarin	Segment in juice/syrup	Organic	2387D-01
2387P-23	Mint	Leaves	Organic	2387D-01
2387P-24	Nigella	Seed	Organic	2387D-01
2387P-25	Olive	Oil, Seedless, Pepper, Almond, Jam, Paste	Organic	2387D-01
2387P-26	Onion	IQF	Organic	2387D-01
2387P-27	Orange	Segment in juice/syrup	Organic	2387D-01
2387P-28	Oregano	Seed	Organic	2387D-01
2387P-29	Paper (Red, Yellow, Green)	IQF	Organic	2387D-01
2387P-30	Peach	IQF, Jam	Organic	2387D-01
2387P-31	Pear	IQF	Organic	2387D-01

13- 2391 Vahap Baran BAYDOĞAN

Agricultural units

No	Unit name	Number of producers, hectare and crop	Status
2391F-01	Vahap Baran Baydoğan	1 Producer, (b) (4) da, Olive Cultivation	Organic
		1 Producer, da, Olive Cultivation	IC 3

Processing units

Ünit nr	Unit name	Process	Address
2391D-01	ARES ORGANİK GIDA TEK.	Documentation, Marketing	Alntıntepe Mah. İstasyon yolu sok. No:3 Maltepe/
	SAN. Ve DIŞ TIC. LTD. ŞTİ.	-	ISTANBUL - TURKEY

Products

Product no	Name product	Last product	Status	Process no
2391P-01	Olive	Fresh	Organic	2387D-01
2391P-02	Olive Oil	Olive Oil	Organic	2387D-01

14- 2453 OLİVA GIDA

Agricultural units

No	Unit name	Number of producers, hectare and crop	Status
2453F-01	Çine-AYDIN	1 Üretici, (b) (4) da, Zeytin	Geçiş 2
2453F-02	Çine-AYDIN	1 Üretici (b) (4) da, Zeytin	Geçiş 3

Processing units

Ünit nr	Unit name	Process	Address
2453D-01	OLİVA GIDA	Yıkama, Kırma, Ayırma, Stoklama, Paketleme,	İzmir Yolu Üzeri 4. km.Gaye Sanayi Sitesi Karşısı
		Dokümantasyon, satış	Söke-AYDIN

Product no	Name product	Last product	Status	Process no
2453P-01	Olive	Olive Oil	IC2	2453D-01
2453P-02	Olive	Olive Oil	IC3	2453D-01

15-2475 MEYSAN

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2475F-01	TİRE	26 Producers, (b) (4) da, Figs	Organic
2475F-01	TİRE	10 Producers, (b) (4) da, Figs	IC 2
2475F-01	TİRE	14 Producers, da, Walnut	Organic
2475F-01	TİRE	7 Producers, (b) (4) da, Walnut	IC 2
2475F-01	TİRE	23 Producers, (b) (4) da, Olive	Organic
2475F-01	TİRE	4 Producers, (b) (4 da, Olive	IC 2
2475F-02	MALATYA	11 Producers (b) (4) da, Apricots	Organic
2475F-02	MALATYA	3 Producers, (b) (4)da, Apricots	IC 3
2475F-02	MALATYA	5 Producers, da, Apricots	IC 2
2475F-02	MALATYA	6 Producers, (b) (4) da, Apricots	IC 1

Processing units

Unit nr	Unit	Process	Address
2475D-01	MEY-SAN ORGANİK GIDA TARIM ÜRÜNLERİ SAN. TİC. LTD. ŞTİ.	Processing, marketing, documentation, organization	Sarıoğlu Mah. Otcu 1 sok, Kayısı İhracatçıları İş Merkezi No: 43, Malatya
2475D-02	BAŞARAN TARIM ÜRÜNLERİ TİC. LTD.ŞTİ.	Processing, documentation,	Ayfer Sok. No:13 Ege Serbest Bölgesi Gaziemir- İZMİR
2475D-03	MAMUR (KAYISI ÇEKIRDEK ALIM VE IŞLEMESI)	Processing, documentation,	Yağmurlu mah. Akçadağ-MALATYA

Product nr	Product	Final product	Status	Processing unit
2475P-01	Figs	Dried	Organic	2475D-01, 02
2475P-02	Walnut	Dried	Organic	2475D-01, 02
2475P-04	Chestnut	Fresh	Organic	2475D-01, 02
2475P-05	Olive	Fresh	Organic	2475D-01, 02
2475P-12	Apricots	Dried	Organic	2475D-01, 02
2475P-13	Apricot Kernels	Dried	Organic	2475D-01, 02
2475P-14	Raisins*	Dried	Organic	2475D-01, 02
2475P-15	Apricots**	Dried	Organic	2475D-01, 02
2475P-16	Diced Apricots**	Dried	Organic	2475D-01, 02

2475P-17	Apricot Paste* *	Dried	Organic	2475D-01, 02
2475P-18	Figs**	Dried	Organic	2475D-01, 02
2475P-19	Diced Figs**	Dried	Organic	2475D-01, 02
2475P-20	Dried Fig Paste **	Dried	Organic	2475D-01, 02
2475P-21	Dried Mulberries*	Dried	Organic	2475D-01, 02
2475P-22	Dried Sour Cherry *	Dried	Organic	2475D-01, 02
2475P-23	Sultana Raisins (Dipped)*	Dried	Organic	2475D-01, 02, 03
2475P-24	Sultana Raisins* (Undipped))	Dried	Organic	2475D-01, 02, 03
2475P-25	Dried Tomatoes*	Dried	Organic	2475D-01, 02
2475P-26	Dried Plums *	Dried	Organic	2475D-01, 02
2475P-27	Dried Plum Paste *	Dried	Organic	2475D-01, 02
2475P-28	Fruit Mix *	Dried	Organic	2475D-01, 02
2475P-29	Dried Apples *	Dried	Organic	2475D-01, 02
2475P-30	Dried Peach *	Dried	Organic	2475D-01, 02
2475P-31	Chickpeas*	Dried	Organic	2475D-01, 02
2475P-32	Red Lentils *	Dried	Organic	2475D-01, 02
2475P-33	Green Lentils*	Dried	Organic	2475D-01, 02
2475P-34	Beans*	Dried	Organic	2475D-01, 02
2475P-35	Bulgur*	Dried	Organic	2475D-01, 02
2475P-36	Apricot Kernels **	Dried	Organic	2475D-01, 02
2475P-37	Apricot Kernel Oil *	Yağ (Oil)	Organic	2475D-01, 02
2475P-38	Hazelnut Kernels *	Dried	Organic	2475D-01, 02
2475P-39	Roasted Hazelnut Kernels*	Dried	Organic	2475D-01, 02
2475P-40	Hazelnut Kernels Powder*	Dried	Organic	2475D-01, 02
2475P-41	Pistachios*	Dried	Organic	2475D-01, 02
2475P-42	Pine nut*	Dried	Organic	2475D-01, 02
2475P-43	Almond*	Dried	Organic	2475D-01, 02
2475P-44	Chestnut*	Dried	Organic	2475D-01, 02
2475P-45	Blue Poppy Seads*	Dried	Organic	2475D-01, 02
2475P-46	White Poppy Seads*	Dried	Organic	2475D-01, 02
2475P-47	IQF Strawberries*	Frozen	Organic	2475D-01, 02
2475P-48	IQF Sweet Cherries*	Frozen	Organic	2475D-01, 02
2475P-49	IQF Apricots*	Frozen	Organic	2475D-01, 02
2475P-50	IQF Plums*	Frozen	Organic	2475D-01, 02
2475P-51	IQF Sour Cherries*	Frozen	Organic	2475D-01, 02
2475P-52	IQF Peaches*	Frozen	Organic	2475D-01, 02

2475P-53	IQF Raspberry*	Frozen	Organic	2475D-01, 02
2475P-54	IQF Tomatoes*	Frozen	Organic	2475D-01, 02
2475P-55	IQF Red Pepper*	Frozen	Organic	2475D-01, 02
2475P-56	Apple Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-57	Sour Cherry Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-58	Pomegranate Juice **Concentrate	Concentrate	Organic	2475D-01, 02
2475P-59	Pear Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-60	Apricot Puree*	Puree	Organic	2475D-01, 02
2475P-61	Apple Puree*	Puree	Organic	2475D-01, 02
2475P-62	Peach Puree*	Puree	Organic	2475D-01, 02
2475P-63	Pear Puree*	Puree	Organic	2475D-01, 02
2475P-64	Strawberry Puree*	Puree	Organic	2475D-01, 02
2475P-65	Plum Puree*	Puree	Organic	2475D-01, 02
2475P-66	Cherry Puree*	Puree	Organic	2475D-01, 02
2475P-67	Raspberry Puree *	Puree	Organic	2475D-01, 02

16- 2484 MEYSÜT Processing units:

Unit nr	Unit	Process	Address
2484D-01	Meysüt Gıda ve Makina San. ve	Organization, documentation, marketing	Dumlupınar Mah. 1522 Sok. No 2 Görman Apt. Kat 1 / 4
	Tic. Ltd. Şti.		MERSÍN - TURKEY
2484D-02	GKM Gıda Maddleri Sanayi Tic.	Processing, storing, organization,	Dumlupınar mah 1522 sok No 2 Göknan Apt. Kat 1/4
	Ltd.Şti	documentation	MERSÍN

Agricultural units:

Γ	Unit nr	Unit	Total area, crops and farmers	Status
	•			

Product nr	Product	Final product	Status	Processing unit
2484P-01	Carob Fruit	Locust Bean Gum	Organic	2484D-02
2484P-02	Carob Fruit	Kibbled Carob Cubes	Organic	2484D-02
2484P-03	Carob Fruit	Carob Germ	Organic	2484D-02
2484P-04	Carob Fruit	Toasted Carob Powder	Organic	2484D-02
2484P-05	Carob Fruit	Carob Molasses	Organic	2484D-02
2484P-06	Carob Fruit	Clear Carob Syrup	Organic	2484D-02
2484P-07	Carob Fruit	Carob Fiber	Organic	2484D-02

17-2508 KALKAN TARIM

Processing unit:

Unit nr	Unit	Process	Address
2508D-01	Kalkan organik Ltd. Şti.	Processing, Production, Documentation, Marketing	Nazilli - Aydın
			TURKİYE

Agriculturel units:

Unit nr	Unit	Total area, crops and farmers	Status
2508F-01	Kalkan organik Ltd. Şti.	11 Producers, (b) (4) ha, Olive, Fig, Chestnut	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
2508P-01	Figs	Dried	Organic	2508D-01
2508P-02	Apricots	Dried	Organic	2508D-01

18-2516 ARIN GIDA

Processing units:

Ünite numarası	Ünite	Proses	Adres
2516D-01	Arın Gida Dis Ticaret A.S.	Processing of Fruit concentarate and puree	Civril – Denizli / TURKEY

Agriculturel units:

Unit nr	Unit	Total area, crops and farmers	Status
None			

Product nr	Product	Final product	Status	Processing unit
2516P-01	Apple	Concentrate, fresh	Organic	2009D-01
2516P-02	Cherry	Concentrate, fresh	Organic	2009D-01
2516P-03	Peach	Concentrate, fresh	Organic	2009D-01
2516P-04	Apricots	Concentrate, fresh	Organic	2009D-01
2516P-05	Pear	Concentrate, fresh	Organic	2009D-01
2516P-06	Quince	Concentrate, fresh	Organic	2009D-01
2516P-07	Strawberries	Concentrate, fresh	Organic	2009D-01
2516P-08	Pomegranate	Concentrate, fresh	Organic	2009D-01
2516P-09	Black Carrot	Concentrate, fresh	Organic	2009D-01

19-2527 LIMKON

Processing units:

Unit nr	Unit	Process	Address
2527D-01	LİMKON GIDA SAN. VE TİC .AŞ	Import, export, processing documentation,	Adana Hacı Sabancı OrganizeSanayi
		marketing	Bölgesi

Agricultural units:

Ī	Unit nr	Unit	Total area, crops and farmers	Status
Ī	None			

Product nr	Product	Final product	Status	Processing unit
2527P-01	Apple	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-02	Pears	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-03	Quince	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-04	Pomegranate	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-05	Grapefruit	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-06	Orange	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-07	Lemon	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-08	Mandarin	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-09	Carrots	Concentrate, Aroma	Organic	2527D-01
2527P-10	Black Carrots	Concentrate, Aroma	Organic	2527D-01
2527P-11	Strawberry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-12	Sour Cherry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-13	Cherry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-14	Tomato	Concentrate, Puree, Aroma	Organic	2527D-01
2527P-15	Apricot	Concentrate, Puree, Aroma	Organic	2527D-01
2527P-16	Peaches	Concentrate, Puree, Aroma	Organic	2527D-01

20-2534 WBT

Processing units:

Ünit nr	Unit name	Process	Address
2534D-01	WBT	Processing, production, storing, marketing,	Organize San. 2. cad. No: 10 - ANTALYA
		documentation	

Agriculturel units:

- ground and a second				
	No	Unit name	Number of producers, hectare and crop	Status
Ī	_			

Product no	Name product	Last product	Status	Process no
2534P-01	Anise	Seed	Organic	2534D-01
2534P-02	Bay	Leaves	Organic	2534D-01
2534P-03	Carob	Powder	Organic	2534D-01
2534P-04	Cistus	Leaves	Organic	2534D-01
2534P-05	Cumin	Seed	Organic	2534D-01
2534P-06	Fennel	Seed	Organic	2534D-01
2534P-07	Myrtle	Leaves	Organic	2534D-01
2534P-08	Oregano	Leaves	Organic	2534D-01
2534P-09	Рорру	Seed	Organic	2534D-01
2534P-10	Rosemary	Leaves	Organic	2534D-01
2534P-11	Sage	Leaves	Organic	2534D-01
2534P-12	Savory	Leaves	Organic	2534D-01
2534P-13	Sumac	Powder	Organic	2534D-01
2534P-14	Thyme	Leaves	Organic	2534D-01
2534P-15	Vitex	Seeds	Organic	2534D-01

21 - 2542 EKOTURKA

Processing units:

Unit nr	Unit	Process	Address
2542D-01	EKOTURKA TEKSTİL TARIM	Processing, packing, storing, documentation,	Petrol Mah. Organize Sanayi Bölgesi 7. Cadde
	HAYV. TAŞ. SAN. VE TİC. AŞ	marketing	No:9 Adıyaman-TURKEY
2542D-02	Mersin Free Zone Store	Processing, packing, storing	Evren mah. 100.yil cad. No 2 Karacailyas-Mersin-
			TURKEY

Agricultural units:

Ī	Unit nr	Unit	Total area, crops and farmers	Status
Γ	-			

Product nr	Product	Final product	Status	Processing unit
2542P-01	Barley	Grain	Organic	2542D-01, 02
2542P-02	Beans	Bean	Organic	2542D-01, 02
2542P-03	Chickpea	Pea	Organic	2542D-01, 02
2542P-04	Corn	Grain	Organic	2542D-01, 02
2542P-05	Cotton	Lint	Organic	2542D-01, 02
2542P-06	Hazelnuts	Kernel	Organic	2542D-01, 02
2542P-07	Kidney Bean	Bean	Organic	2542D-01, 02
2542P-08	Lentils Green	Grain	Organic	2542D-01, 02
2542P-09	Lentils Red	Grain	Organic	2542D-01, 02
2542P-10	Lentils Yellow	Grain	Organic	2542D-01, 02
2542P-11	Linseed	Grain	Organic	2542D-01, 02
2542P-12	Millet	Grain	Organic	2542D-01, 02
2542P-13	Mung Beans	Bean	Organic	2542D-01, 02
2542P-14	Mustard	Grain	Organic	2542D-01, 02
2542P-15	Oat	Grain	Organic	2542D-01, 02
2542P-16	Peas	Pea	Organic	2542D-01, 02
2542P-17	Pistachios	Kernel	Organic	2542D-01, 02
2542P-18	Rapeseeds	Grain	Organic	2542D-01, 02
2542P-19	Rice	Grain	Organic	2542D-01, 02
2542P-20	Rye	Grain	Organic	2542D-01, 02
2542P-21	Safflower	Grain	Organic	2542D-01, 02

2542P-22	Sesame	Grain	Organic	2542D-01, 02
2542P-23	Sorghum	Grain	Organic	2542D-01, 02
2542P-24	Soybean	Bean	Organic	2542D-01, 02
2542P-25	Sunflower Seeds	Kernel	Organic	2542D-01, 02
2542P-26	Vetch Seeds	Grain	Organic	2542D-01, 02
2542P-27	Wheat	Grain	Organic	2542D-01, 02

22- 2573 CAFER İPEK

Processing units:

Unit nr	Unit	Process	Address
	-	-	-

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2573F-01	Cafer İPEK – Dereçine – Sultandağı / AFYON KARAHİSAR/ TURKEY	1 manufacturer, (b) (4) ha. Fruit production	Organic

Product no	Name product	Last product	Status	Process no
2573P-01	Almonds	Crusted	Organic	-
2573P-02	Apple	Fresh	Organic	-
2573P-03	Apricots	Fresh	Organic	-
2573P-04	Blackberry	Fresh	Organic	-
2573P-05	Cherry	Fresh	Organic	-
2573P-06	Grapes	Fresh	Organic	-
2573P-07	Mulberry	Fresh	Organic	-
2573P-08	Nectarine	Fresh	Organic	-
2573P-09	Peach	Fresh	Organic	-
2573P-10	Pears	Fresh	Organic	-
2573P-11	Plum	Fresh, dried	Organic	-
2573P-12	Quince	Fresh	Organic	-
2573P-13	Sour Cherry	Fresh	Organic	-
2573P-14	Walnut	Crusted	Organic	-

23-2629 BIO NATURAL

Processing units:

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	Unit nr	Unit	Process	Address
	-	-	-	-

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2629F-01	Ali KARA – Yukarıkaşıkara – Yalvaç / ISPARTA	1 manufacturer, (b) (4) ha Apple, Apricot production	Organic

Products:

Product no	Name product	Last product	Status	Process no
2629P-01	Apple	Fresh	IC2	-
2629P-02	Apricot	Fresh	IC2	-

24-2630 BAHÇECİ TARIM

Processing units:

1 To observing written				
Unit nr	Unit	Process	Address	
2630D-01	Bahceci tarım urunleri tic ltd sti	Marketing, Storage, Accounting,	Balçova - İzmir	
2630D-02	Yosun tarım	Processing, Packaging, Storage	Yüregir / Adana	

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Product no	Name product	Last product	Status	Process no
2630-P01	%3 Copper	Okey	organic	2630-D01

25- 2633 ASON

Processing units:

Unit nr	Unit	Process	Address
2633D-01	Ason Dış Ticaret Limited Şirketi	3, 3, 3,	Caddebostan Mah. Cami Sk. Edsan Apt. No:3 D:2, Kadıköy - İstanbul

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	l -	-

Product no	Name product	Last product	Status	Process no
2633P-01	Barley	Grain	Organic	2633D-01
2633P-02	Wheat	Grain	Organic	2633D-01
2633P-03	Maize	Grain	Organic	2633D-01
2633P-04	Sorghum	Grain	Organic	2633D-01
2633P-05	Oat	Grain	Organic	2633D-01
2633P-06	Rye	Grain	Organic	2633D-01
2633P-07	Triticale	Grain	Organic	2633D-01
2633P-08	Pistachio	Nuts	Organic	2633D-01
2633P-09	Hazelnuts	Nuts	Organic	2633D-01
2633P-10	Millet	Grain	Organic	2633D-01
2633P-11	Flax Seed	Oil Seed	Organic	2633D-01
2633P-12	Sunflower Seed	Oil Seed	Organic	2633D-01
2633P-13	Rape Seed	Oil Seed	Organic	2633D-01
2633P-14	Mustard Seed	Oil Seed	Organic	2633D-01
2633P-15	Safflower Seed	Oil Seed	Organic	2633D-01
2633P-16	Apricot Seed	Oil Seed	Organic	2633D-01
2633P-17	Grape Seed	Oil Seed	Organic	2633D-01
2633P-18	Chickpeas	Pulses	Organic	2633D-01
2633P-19	Red Beans	Pulses	Organic	2633D-01
2633P-20	White Beans	Pulses	Organic	2633D-01
2633P-21	Green Mung beans	Pulses	Organic	2633D-01
2633P-22	Red Lentils	Pulses	Organic	2633D-01
2633P-23	Green Lentils	Pulses	Organic	2633D-01
2633P-24	Yellow Lentils	Pulses	Organic	2633D-01
2633P-25	Pea Beans	Pulses	Organic	2633D-01

2633P-26	Soybeans	Pulses	Organic	2633D-01	
2633P-27	Kidney Beans	Pulses	Organic	2633D-01	
2633P-28	Rice	Grain	Organic	2633D-01	
2633P-29	Sesame	Dried	Organic	2633D-01	
2633P-30	Figs	Dried	Organic	2633D-01	
2633P-31	Apricots	Dried	Organic	2633D-01	
2633P-32	Grape	Dried	Organic	2633D-01	
2633P-33	Plum	Dried	Organic	2633D-01	
2633P-34	Mulberry	Dried	Organic	2633D-01	

26- 2650 DOHLER MARMARA

Processing units:

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Unit nr	Unit	Process	Address
2650D-01	Döhler Marmara Gıda Sanayi A.Ş.	Marketing and processing of fruit juice, fruit juice	Koçyataği Mevkii,
		concentrate, puree, transporting, and	Ovaköy
		documentations.	Merkez / BALIKESİR-TURKEY

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
=	-	-	-

Product no	Name product	Last product	Status	Process no
2650P-01	Apple Puree Concentrate	Puree Concentrate 17-19	ORGANIC	2650D-01
		Brix		
2650P-02	Apple Puree Concentrate	Puree Concentrate 30-32	ORGANIC	2650D-01
		Brix		
2650P-03	Apple Puree Concentrate	Puree Concentrate 36-38	ORGANIC	2650D-01
		Brix		
2650P-04	Apple Puree	Puree SS 12-18 Brix	ORGANIC	2650D-01
2650P-05	Apricot Puree Concentrate	Puree Concentrate 30-32	ORGANIC	2650D-01
		Brix		
2650P-06	Apricot Puree	SS 12-20 Brix	ORGANIC	2650D-01
2650P-07	Carrot Puree	SS 7,5-11,5 Brix	ORGANIC	2650D-01

2650P-08	Carrot Puree Concentrate	Puree Concentrate 20-22	ORGANIC	2650D-01
		Brix	00041110	
2650P-09	Red Pepper Puree	Puree Concentrate 18-20	ORGANIC	2650D-01
	Concentrate	Brix		
2650P-10	Red Pepper Puree	Puree Concentrate 22-24	ORGANIC	2650D-01
	Concentrate	Brix		
2650P-11	Black Mulberry Puree	Puree SS 11-15 Brix	ORGANIC	2650D-01
2650P-12	Peach Puree Concentrate	Puree Concentrate 20-22	ORGANIC	2650D-01
		Brix		
2650P-13	Peach Puree Concentrate	Puree Concentrate 30-32	ORGANIC	2650D-01
		Brix		
2650P-14	Peach Puree	Puree SS 8,5-11,5	ORGANIC	2650D-01
2650P-15	Pear Puree	Puree SS 11-17	ORGANIC	2650D-01
2650P-16	Pear Puree Concentrate	Puree Concentrate 30-32	ORGANIC	2650D-01
		Brix		
2650P-17	Plum Puree	Puree SS 10-18 Brix	ORGANIC	2650D-01
2650P-18	Quince Puree	Puree SS 11-15 Brix	ORGANIC	2650D-01
2650P-19	Quince Puree Concentrate	Puree Concentrate 20-22	ORGANIC	2650D-01
		Brix		
2650P-20	Sour Cherry Puree	Puree SS 16-24 Brix	ORGANIC	2650D-01
2650P-21	Sour Cherry Puree	Puree Concentrate 30-32	ORGANIC	2650D-01
	Concentrate	Brix		
2650P-22	Sweet Cherry Puree	Puree Concentrate 30-32	ORGANIC	2650D-01
	Concentrate	Brix		

27- NIGELLA

Processing units:

Unit nr	Unit	Process	Address
2654D-01	Nigella Tarım Hayvancılık Gıda	Documentation, Marketing	İstiklal Mah Reşadiye Cad. Yelkovan İş Merkezi Kat
	Peyzaj İnş. San. Tic. Ltd. Şti.	-	:4 No:1
			Eskişehir-TURKEY

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Product no	Name product	Last product	Status	Process no
2654P-01	Pears	Fresh	ORGANIC	-
2654P-02	Raspberries	Fresh	ORGANIC	-
2654P-03	Grapes	Fresh	ORGANIC	-
2654P-04	Quince	Fresh	ORGANIC	-
2654P-05	Almonds	Fresh	ORGANIC	-
2654P-06	Blackberry	Fresh	ORGANIC	-
2654P-07	Walnut	Fresh	ORGANIC	-
2654P-08	Mulberry	Fresh	ORGANIC	-
2654P-09	Apple	Fresh	ORGANIC	-
2654P-10	Plum	Fresh	ORGANIC	-
2654P-11	Apricot	Fresh	ORGANIC	-
2654P-12	Cherry	Fresh	ORGANIC	-
2654P-13	Peaches	Fresh	ORGANIC	-
2654P-14	Sour Cherry	Fresh	ORGANIC	-
2654P-15	Eggplant	Fresh	ORGANIC	-
2654P-16	Pumpkin	Fresh	ORGANIC	-
2654P-17	Cucumber	Fresh	ORGANIC	-
2654P-18	Tomato	Fresh	ORGANIC	-
2654P-19	Okra	Fresh	ORGANIC	-

2654P-20	Potato	Fresh	ORGANIC	-
2654P-21	Parsley	Fresh	ORGANIC	-
2654P-22	Red Pepper	Fresh	ORGANIC	-
2654P-23	Celery	Fresh	ORGANIC	-
2654P-24	Leek	Fresh	ORGANIC	-
2654P-25	Golden Berry	Fresh	ORGANIC	-
2654P-26	Stuffed Pepper	Fresh	ORGANIC	-
2654P-27	Cayenne Pepper	Raisin	ORGANIC	-
2654P-28	Melon	Fresh	ORGANIC	-
2654P-29	Watermelon	Fresh	ORGANIC	-
2654P-30	Onion	Fresh	ORGANIC	-
2654P-31	Garlic	Fresh	ORGANIC	-
2654P-32	Corn	Fresh	ORGANIC	-
2654P-33	Spinach	Fresh	ORGANIC	-
2654P-34	Broccoli	Fresh	ORGANIC	-
2654P-35	Cauliflower	Fresh	ORGANIC	-
2654P-36	Peas	Fresh	ORGANIC	-
2654P-37	Organic Tarhana	Organic Tarhana	ORGANIC	-
2654P-38	Organic Tomato Sauce	Organic Tomato Sauce	ORGANIC	-
2654P-39	Organic Pepper Sauce	Organic Pepper Sauce	ORGANIC	-
2654P-40	Organic Hot Sauce	Organic Hot Sauce	ORGANIC	-
2654P-41	Organic Eggplant with Basil Sauce	Organic Eggplant with Basil Sauce	ORGANIC	-
2654P-42	Organic Apple Vinegar	Organic Apple Cider Vinegar	ORGANIC	-
2654P-43	Organic home-made pasta (noodles)	Organic home-made pasta (noodles)	ORGANIC	-
2654P-44	Grape Vinegar	Grape Vinegar	ORGANIC	-
2654P-45	Boiled Grape Juice	Boiled Grape Juice	ORGANIC	-
2654P-46	Mixed pickles	Mixed pickles	ORGANIC	-
2654P-47	Tomatoes	Dried	ORGANIC	

2654P-48	Golden Berry	Dried	ORGANIC	-
2654P-49	Boiled Apple juices	Boiled Apple juices	ORGANIC	-

28- 2669 GKM

Processing units:

Unit nr	Unit	Process	Address
2669D-01	Meysut Gıda Mak. Sanayi Tic.	Processing, Organization, Quality Systems,	Dumlupınar mah 1522 sok No 2 Gorman Apt. Kat
	Ltd.Şti	Storage, Marketing	1/4, Mersin
			TURKEY
2669D-02	GKM Gıda Mad. Sanayi Tic. Ltd.Şti	Processing, Storage, Marketing	Dumlupinar mah 1522 sok No 2 Gorman Apt. Kat
			1/4, Mersin
			TURKEY

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	•	-

Products:

Product no	Name product	Last product	Status	Process no
2669P-01	Carob Fruit	Locust Bean Gum	ORGANIC	2669D-01,02
2669P-02	Carob Fruit	Kibbled Carob Cubes	ORGANIC	2669D-01,02
2669P-03	Carob Fruit	Carob Germ	ORGANIC	2669D-01,02
2669P-04	Carob Fruit	Toasted Carob Powder	ORGANIC	2669D-01,02
2669P-05	Carob Fruit	Carob Molasses	ORGANIC	2669D-01,02
2669P-06	Carob Fruit	Clear Carob Syrup	ORGANIC	2669D-01,02
2669P-07	Carob Fruit	Carob Fiber	ORGANIC	2669D-01,02

29-3006 SPELTA

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3006F-04	Novopetrovskoye - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3006F-05	EF Kahovskiy - Kherson	ha arable fields, 1 producer	ORG
3006F-18	Ingulets - Kherson	ha arable fields, 1 producer	ORG
3006F-19	Nadiya - Kherson	ha arable fields, 1 producer	ORG
3006F-20	Shedriy Lan - Kherson	ha arable fields, 1 producer	ORG

Processing units:

Unit nr	Unit	Process	Address
3006D-01	Spelta ltd.	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	2 Frunze Str., 73002 Kherson, Ukraine

Products:

Product nr	Product	Final product	Status	Processing unit
3006P-01	Barley	Seeds	Org	3006D-01
3006P-02	Corn	Seeds	Org	3006D-01
3006P-03	Flax	Seeds	Org	3006D-01
3006P-04	Mustard	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-05	Peas	Seeds	Org	3006D-01
3006P-06	Rapeseed	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-07	Sunflower	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-08	Walnut	Kernel	Org	3006D-01
3006P-09	Wheat	Seeds	Org	3006D-01

30-3013 Alef Ltd.

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3013F-24	FH "Don"- Lugansk	(b) (4) ha arable fields, 1 producer	Org
3013F-26	TOV Agrofirma "Kalmychanka" - Lugansk	ha arable fields, 1 producer	Org
3013F-27	FH "Vdovenko"- Lugansk	ha arable fields, 1 producer	Org
3013F-28	STOV AF "Zakotnenskaya"	ha arable fields, 1 producer	Org
3013F-29	TOV "Ros Agro" - Kirovograd	ha arable fields, 1 producer	Org
3013F-30	TzOV "Lyubava-Agro" - Ternopil	ha arable fields, 1 producer	Org
3013F-31	TOV "Agrofirma Druzba" - Kiev	ha arable fields, 1 producer	Org
3013F-32	TOV "Agroalyans" - Kherson	ha arable fields, 1 producer	Org
3013F-33	OOO SHP "Novaya Ukraina" - Kiev	ha arable fields, 1 producer	Org
3013F-34	TDV "Kolos" - Kirovograd	ha arable fields, 1 producer	Org

Processing units

Unit nr	Unit	Process	Address
3013D-01	ALEF ltd.	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	46, Sovetskaya str., Kherson, , 73000, Ukraine

Product nr	Product	Final product	Status	Processing unit
3013P-01	Alfa-alfa	Seeds, feed	Org	3013D-01
3013P-02	Barley	Seeds	Org	3013D-01
3013P-03	Buckwheat	Seeds	Org	3013D-01
3013P-04	Cheak-pea	Seeds	Org	3013D-01
3013P-05	Corn	Seeds	Org	3013D-01
3013P-06	Flax	Seeds	Org	3013D-01
3013P-07	Grape	Fresh	Org	3013D-01
3013P-08	Lentil	Seeds	Org	3013D-01
3013P-09	Lupine	Seeds	Org	3013D-01
3013P-10	Millet	Seeds	Org	3013D-01
3013P-11	Mustard	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-12	Oat	Seeds	Org	3013D-01
3013P-13	Peas	Seeds	Org	3013D-01
3013P-14	Rapeseed	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-15	Rye	Seeds	Org	3013D-01
3013P-16	Sorghum	Seeds	Org	3013D-01
3013P-17	Soybean	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-18	Sunflower	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-19	Vegetables	Fresh	Org	3013D-01
3013P-20	Walnut	Kernel	Org	3013D-01
3013P-21	Wheat	Seeds	Org	3013D-01

31-3020 Region Agro Itd.

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
NA			

Processing units

1 To obsoring write							
Unit nr	Unit	Process	Address				

3020D-01	Region Agro Itd.	Import-export, trader, finance, documentation, forwarding, investment, organizing farms and processors	10, Naftovykiv str., Kherson, Ukraine
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Product nr	Product	Final product	Status	Processing unit
3020P-01	Alfa-alfa	Seeds, cake	ORG	3020D-01
3020P-02	Barley	Seeds	ORG	3020D-01
3020P-03	Buckwheat	Seeds	ORG	3020D-01
3020P-04	Corn	Seeds, oil, cake	ORG	3020D-01
3020P-05	Flax	Seeds	ORG	3020D-01
3020P-06	Millet	Seeds	ORG	3020D-01
3020P-07	Mustard	Seeds, oil, cake	ORG	3020D-01
3020P-08	Oat	Seeds	ORG	3020D-01
3020P-09	Peas	Seeds	ORG	3020D-01
3020P-10	Rapeseeds	Seeds, oil, cake	ORG	3020D-01
3020P-11	Rye	Seeds	ORG	3020D-01
3020P-12	Safflower	Seeds, oil, cake	ORG	3020D-01
3020P-13	Sorghum	Seeds	ORG	3020D-01
3020P-14	Soybean	Seeds, oil, cake	ORG	3020D-01
3020P-15	Sunflower	Seeds, oil, cake	ORG	3020D-01
3020P-16	Wheat	Seeds	ORG	3020D-01

32-3026 SIBNUT

Agricultural units:

Agriculturul unito:					
Unit nr	Unit	Total area, crops and farmers	Status		
3026F-01	Altai Region, Ongudai	(b) (4) ha. Cedar nut kernels, 15 collectors unit	Organic		

Processing units

1 To obsoring white						
Unit nr	Unit	Process	Address			

3026D-01	SIBNUT LTD	Cedar nut process, documentation, organization, marketing,	Russland, 630501 Elitnoe villige, Novosibirsk district
		export, trading.	ul. Polevaya Str. 30 Russia
3026D-02	KERN LTD.	Documentation, organization of collectors.	Altai region, Ongudai
		_	Russia

Product nr	Product	Final product	Status	Processing unit
3026P-01	Cedar Pine Nut Kernel	Nuts	ORG	3026D-01, 02
3026P-02	Cedar Pine Nut Kernel Oil	Oil	ORG	3026D-01, 02

33 - 3076 UFC

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3076F-01	SOOO Ptakhivnyk - Kherson	(b) (4) ha arable fields, 1 produc	er Org
3076F-02	OOO TD GRAH - Kherson	ha arable fields, 1 produc	er Org
3076F-03	Askania-Nova OPH - Kherson	ha arable fields, 1 produc	er Org
3076F-04	Prodexim CD - Kherson	ha arable fields, 1 produc	er Org
3076F-05	Lana Podove - Kherson	ha arable fields, 1 produc	er Org

Processing units:

Unit nr	Unit name	Process	Address
3076D-01	Ukrainian Food Corporation LLC	Export, trade, administration, organizing farms and processors, transport, storage, finance	5, Port-Elevator, Kherson, 73000, Ukraine

Product no	Name product	Last product	Product Category	Status	Process no
3076P-01	Alfa-alfa	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-02	Barley	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-03	Cherry	Fresh	A,D,E	ORG	3076D-01
3076P-04	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3076D-01
3076P-05	Flax	Seeds	A,D,E	ORG	3076D-01
3076P-06	Grape	Fresh	A,D,E	ORG	3076D-01
3076P-07	Millet	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-08	Peach	Fresh	A,D,E	ORG	3076D-01
3076P-09	Peas	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-10	Pumpkin	Kernel	A,D,E	ORG	3076D-01
3076P-11	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-12	Strawberry	Fresh	A,D,E	ORG	3076D-01
3076P-13	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-14	Walnut	Kernel	A,D,E	ORG	3076D-01
3076P-15	Wheat	Seeds, grouts, flour meal	A,D,E	ORG	3076D-01
3076P-16	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-17	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01

34-3077 TOO PROIZVODSTVENNIY KOMPLEX MOL-TABYS

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3077F-01	TOO "IshimAgroNord"	(b) (4) ha arable fields, 1 producer	Org
3077F-02	TOO "JNV"	ha arable fields, 1 producer	Org

Processing units:

Unit nr	Unit name	Process	Address
	"Mol Tahve»	Import-export, Trader, Documentation, Finance, Investment, Forwarding, Transshipment, Organizing farms and processors, Storage	1 proezd Universalniy str., 23, Petropavlovsk, Severo-Kazakhstanskiy region, Republic Kazakhstan

Product no	Name product	Last product	Product Category	Status	Process no
3077P-01	Barley	Seeds, grouts	A,D	ORG	3077D-01
3077P-02	Camelina	Seeds	Α	ORG	3077D-01
3077P-03	Chick-pea	Seeds	Α	ORG	3077D-01
3077P-04	Flax	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-05	Mustard	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-06	Oat	Seeds, flour	A,D	ORG	3077D-01
3077P-07	Peas	Seeds, grouts	A,D	ORG	3077D-01
3077P-08	Rapessed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-09	Rye	Seeds, grouts, flour	A,D	ORG	3077D-01
3077P-10	Wheat	Seeds, grouts, flour	A,D	ORG	3077D-01

35-3087 YUGEKOTOP

Agriculturel units:

Unit No	Unit name	Total area, crops and farmers	Status
3087F-01	"Krynichanskoe" – Nikolaev	(b) (4) ha arable fields, 1 producer	Org
3087F-02	"Dovira+" – Nikolaev	ha arable fields, 1 producer	Org
3087F-03	"Edem" – Nikolaev	ha arable fields, 1 producer	Org
3087F-04	"Ukragroinvest-Holding" – Jitomyr	ha arable fields, 1 producer	Org
3087F-05	"Dobrobut" – Kirovograd	ha arable fields, 1 producer	Org
3087F-09	Plasa - Odessa	ha arable fields, 1 producer	Org
3087F-10	Serbinova - Odessa	ha arable fields, 1 producer	Org
3087F-11	TOV NIK-AGRO – Nikolaev	ha arable fields, 1 producer	Org
3087F-12	TOV Promin – Nikolaev	ha arable fields, 1 producer	Org
3087F-13	PSP Agro Urojay – Nikolaev	ha arable fields, 1 producer	Org
3087F-14	TOV Stebne – Cherkassy	ha arable fields, 1 producer	Org

Processing units:

Unit no	Unit name	Process	Address
3087D-01	I Y LICIERCHOLD HICE		4/4, Lyagina str., office 301, Nikolaev, 54001 Ukraine (old - Ukraine, 54055, Nikolaev, Sevastopolskaya str., 66-B)
3087D-02	SC Agrocontract ltd.	Storage and transshipment	89, Kosmonavtov str., Nikolaev, Ukraine

3087D-03	SGS Ukraine	Inspection	40/42, Atamana Golovatogo str., Odessa, Ukraine
3087D-05	"Kalina Torg Plus" ltd.	Seeds processing, oil and cake production	135, Kirova str., v. Voskresenskoe, Nikolaev region, 57210 Ukraine
3087D-06	Orexim Limited	Financing, foreign trader	66-B, Sevastopolskaya str., Nikolaev, 54055, Ukraine
3087D-07	NikaTransGroup Itd.	Storage and transshipment	1-A, Morekhodnaya str., Nikolaev, 54003 Ukraine
3087D-08	Intertek Ukraine	Inspection	115, Chermonorskogo Kazachestva str., Odessa, Ukraine
3087D-09	Everi Itd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	14, Gmyreva str., Nikolaev, Ukraine
3087D-10	Snita Ltd	Process seed, oil and cake production	4, Promyshlennaya str., Bashtanka, 56100, Ukraine
3087D-11	Novomyrgorodskiy Sugar Factory	Process sugar, sugar beet pulp cake/expeller, sugar beet pulp molasses	v.Kapitonivka, Novomyrgorodskiy area, Kirovograd region, Ukraine
3087D-12	Fozzy-Food	Import-export, trading, finance, forwarding	5, Promyshlennaya str., t.Vyshnevoe, Kiev region, 08132, Ukraine
3087D-13	Weltop	Import-export, trading, finance, forwarding	39/41, Shota Rustaveli str., Kiev, 01019, Ukraine
3087D-14	PP ATK-Dnipro	Seeds processing, oil and cake production	34 Trolleybusnaya str., Zaporozhye, 69008 Ukraine
3087D-15	Oliynyi Dom LTD	Seeds processing, oil and cake production	135, Lenina str., v.Lozovatka, Krivorozhskiy district, Dnepropetrovsk region, 53020 Ukraine
3087D-16	Nikolaev MEZ LTD	Seeds processing, oil and cake production	117 Geroev Stalingrada Ave., 54025, Nikolaev, Ukraine

Toducts.					
Product no	Name product	Last product	Product Category	<u>Status</u>	Process no
3087P-01	Alfa-alfa	Seeds and cake/expeller	A,E	ORG	3087D-01-16
3087P-02	Barley Parley	Seeds	A	ORG	3087D-01-16
3087P-03	Corn	Seeds	A	ORG	3087D-01-16
3087P-04	Flax	Seeds, oil and cake/expeller	A,E	ORG	3087D-01-16
3087P-05	Lupine	Seeds	A	ORG	3087D-01-16
3087P-06	Millet Millet	Seeds	A	ORG	3087D-01-16
3087P-07	Peas	Seeds	A	ORG	3087D-01-16
3087P-08	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3087D-01-16
3087P-09	Sorghum	Seeds	A	ORG	3087D-01-16
3087P-10	Sugarbeet	Cake/expeller and pulp/molasses/pellets	A,E	ORG	3087D-01-16
3087P-11	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3087D-01-16
3087P-12	Wheat	Seeds	A	ORG	3087D-01-16

36-3090 EVERI LTD.

Agricultural units:

No	Unit name Number of producers, hectar and crop		Status
3090F-01	Strumok - Odessa	(b) (4) ha arable fields, 1 producer	Org
3090F-02	Perlyna Strumka - Odessa	ha arable fields, 1 producer	Org
3090F-03	Dzherelo - Odessa	ha arable fields, 1 producer	Org
3090F-04	Vapet - Odessa	ha arable fields, 1 producer	Org
3090F-05	SK im.Shevchenko - Odessa	ha arable fields, 1 producer	Org
3090F-06	Glubokoe - Odessa	ha arable fields, 1 producer	Org
3090F-07	SFH Rusev - Odessa	ha arable fields, 1 producer	Org
3090F-08	Strumok Agroservice - Odessa	ha arable fields, 1 producer	Org
3090F-09	Dalakov P.D Odessa	ha arable fields, 1 producer	Org

Processing units:

Ünit nr	Unit name	Process	Address
3090D-01	Everi Itd	Import-export, trading, finance, documentation,	117, Grazhdanskaya str., Mykolayiv,
30300-01	Everi Itd.	organizing farms and processors, forwarding	Ukraine

Product no	Name product	Last product	Product Category	Status	Process no
3090P-01	Alfalfa	Seeds, hay, pellets	A,D,E	ORG	3090D-01
3090P-02	Barley	Seeds	Α	ORG	3090D-01
3090P-03	Corn	Seeds	Α	ORG	3090D-01
3090P-04	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-05	Lupine	Seeds	Α	ORG	3090D-01
3090P-06	Oat	Seeds	Α	ORG	3090D-01
3090P-07	Peas	Seeds	Α	ORG	3090D-01
3090P-08	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-09	Rye	Seeds	Α	ORG	3090D-01
3090P-10	Sorghum	Seeds	Α	ORG	3090D-01
3090P-11	Sugarbeet	Seeds, cake/expeller, Pulp pellets/molasses	A,D,E	ORG	3090D-01
3090P-12	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-13	Walnut	Kernel	A	ORG	3090D-01
3090P-14	Wheat	Seeds	Α	ORG	3090D-01

37-3092 GRAINAGRO LTD

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3092F-02	"Maryanivske" - Odessa	(b) (4) ha arable farming, 1 producer	Org
3092F-03	"Rodina" - Odessa	ha arable farming, 1 producer	Org
3092F-06	LTD "Agro-DIS" - Odessa	ha arable farming, 1 producer	Org
3092F-07	"Svitanok" - Odessa	ha arable farming, 1 producer	Org
3092F-08	"Dobrobut" - Poltava	ha arable farming, 1 producer	Org
3092F-09	PP "Yuran" - Lugansk	ha arable farming, 1 producer	Org
3092F-10	TOV Agrofirma "LBB" - Lugansk	ha arable farming, 1 producer	Org
3092F-11	TOV "Suvorova" - Lugansk	ha arable farming, 1 producer	Org

Processing units:

Ünit nr	Unit name	Process	Address
3092D-01	«Grainagro» ltd.	Import-export, Trader, , Finance, Documentation, Forwarding, Investment, Organizing farms and processors	12, Shevchenko avenue. off. 2., Odessa, 65058 Ukraine

Product no	Name product	Last product	Product Category	Status	Process no
3092P-01	Barley	Seeds	A,D,E	ORG	3092D-01
3092P-02	Buckwheat	Seeds	A,D	ORG	3092D-01
3092P-03	Corn	Seeds	A,D,E	ORG	3092D-01
3092P-04	Flax	Seeds	A,D,E	ORG	3092D-01
3092P-05	Lupine	Seeds	A,E	ORG	3092D-01
3092P-06	Millet	Seeds	A,D,E	ORG	3092D-01
3092P-07	Mustard	Seeds	A,D,E	ORG	3092D-01
3092P-08	Oat	Seeds	A,D,E	ORG	3092D-01
3092P-09	Peas	Seeds	A,D,E	ORG	3092D-01
3092P-10	Rapeseed	Seeds	A,D,E	ORG	3092D-01
3092P-11	Rye	Seeds	A,D,E	ORG	3092D-01
3092P-12	Sorghum	Seeds	A,D,E	ORG	3092D-01
3092P-13	Sunflower	Seeds	A,D,E	ORG	3092D-01
3092P-14	Wheat	Seeds	A,D,E	ORG	3092D-01

38-3093 DNEPR2

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3093F-03	Borozenske SVK - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3093F-09	Krynytsya - Kherson	ha arable fields, 1 producer	ORG
3093F-11	Agrofirma Slavutich - Kirovograd	ha arable fields, 1 producer	ORG
3093F-20	Oasis - Odessa	ha arable fields, 1 producer	ORG
3093F-21	Osnova - Nikolaev	ha arable fields, 1 producer	ORG
3093F-22	MTD - Nikolaev	ha arable fields, 1 producer	ORG
3093F-29	Vidrodzhennya PSP - Nikolaev	ha arable fields, 1 producer	ORG
3093F-30	Rosiya PSP - Nikolaev	ha arable fields, 1 producer	ORG
3093F-31	Zorya AK Lld Kirovograd	ha arable fields, 1 producer	ORG
3093F-32	Roznoshenske Ltd. – Kirovograd	ha arable fields, 1 producer	ORG
3093F-33	Myr AF Ltd. – Kirovograd	ha arable fields, 1 producer	ORG
3093F-34	Rozkishna AK Ltd. – Kirovograd	ha arable fields, 1 producer	ORG

Processing units:

Ünit nr	Unit name	Process	Address
3093D-01	Dnepr-2	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	10 Naftovykiv str., Kherson, Ukraine
3093D-03	Region-Agro Itd	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	10 Naftovykiv str., Kherson, Ukraine
3093D-06	Amiranda	Internal control, transport, administration, sampling	33 Zhukovskogo str., office 403, Odessa, Ukraine
3093D-09	Plant Breeding & Genetic Institute	Breeding and multiplication of original (and commercial) seed (wheat, barley, peas, sunflower, corn, soybean etc.)	3, Ovidiopolskaya road, Odessa, 65036 Ukraine
3093D-14	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelna Str., Kherson, Ukraine, 73011

Product no	Name product	Last product	Product Category	Status	Process no
3093P-01	Alfa-alfa	Cake	A,D	ORG	3093D-01,03,06,09-14,20-26

3093P-02	Barley	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-03	Buckwheat	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-04	Corn	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-05	Mustard	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-06	Peas	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-07	Rapeseeds	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-08	Safflower	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-09	Sorghum	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-10	Soybean	Seeds, oil, cake	Α	ORG	3093D-01,03,06,09-14,20-26
3093P-11	Sunflower	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-12	Wheat	Seeds	Α	ORG	3093D-01,03,06,09-14,20-26

^{*}Oil and seed cake will be produced from the raw quantity mentioned above

39-3094 POLBA

Processors:

Ünit nr	Unit name	Process	Address
3094D-01	Polba PE	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	2 Frunze Str., Kherson, Ukraine, 73002

Production unit:

No	Unit name	Number of producers, hectar and crop	Status
3094F-01	PE Agrofirm «Pancheve»	(b) (4) ha arable fields, 1 producer	ORG
3094F-02	Agrofirm Chkalova Ltd.	ha arable fields, 1 producer	ORG
3094F-03	PE Agrofirm «Mytrofanivska»	ha arable fields, 1 producer	ORG
3094F-04	PE Agrofirm «Prestyzh»	ha arable fields, 1 producer	ORG

Product no	Name product	Last product	Product	Status	Process no
			Category		
3094P-01	Alfa-alfa	Seeds, cake	A,E	ORG	3094D-01
3094P-02	Barley	Seeds	Α	ORG	3094D-01
3094P-03	Corn	Seeds	Α	ORG	3094D-01
3094P-04	Soybean	Seeds, oil, cake	A,D,E	ORG	3094D-01
3094P-05	Sugarbeet	Cake	A,E	ORG	3094D-01
3094P-06	Sunflower	Seeds, oil, cake	A,E	ORG	3094D-01
3094P-07	Wheat	Seeds	A	ORG	3094D-01

40-3096 EL DORADO OIL

Agricultural units:

, .g	~ .			
Unit nr	Unit	Total area, crops and farmers	Status	Farmer
				number
NA				

Processing units:

Ünit nr	Unit name	Process	Address
3096D-01	El Dorado Oils Ilc.	Export, trade, administration, finance, organizing farms and processors, transport, storage	8A, Rizhskaya Str., Kyiv, 04112 Ukraine

Product no	Name product	Last product	Product	Status	Process no
			Category		
3096P-01	Barley	Seeds, grouts	A,E	ORG	3096D-01
3096P-02	Buckwheat	Seeds, grouts	A,E	ORG	3096D-01
3096P-03	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-04	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-05	Millet	Seeds, grouts	A,E	ORG	3096D-01
3096P-06	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-07	Oat	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-08	Peas	Seeds, grouts	A,E	ORG	3096D-01
3096P-09	Pumpkin	Kernel	Α	ORG	3096D-01
3096P-10	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01

3096P-11	Rye	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-12	Sorghum	Seeds, grouts	A,E	ORG	3096D-01
3096P-13	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-14	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-15	Walnut	Kernel	Α	ORG	3096D-01
3096P-16	Wheat	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01

41-3114 FARMEKS

Agricultural units:

Unit Unit		Total area, crops and farmers		
nr				
3114F-01	Urgut-Semerkant/ Özbekistan	(b) (4) ha arable fields, 14 producer	Organic	
3114F-02	Fergana -Özbekistan	(b) (4) ha arable fields, 4 producer	Organic	
3114F-03	Karakalpak-Özbekistan	ha arable fields, 1 producer	Organic	

Processing units

Unit nr	Unit	Process	Address
3114D-01	Farmeks	Documentation, Marketing, Processing, Packing	Ege Serbest Bölgesi, Gaziemir, İzmir - TURKEY

Product Nr	Product	Final product	Status	Processing unit
3114P-01	Grape	Dried	Organic	3114D-01
3114P-02	Apple	Dried	Organic	3114D-01
3114P-03	Apricots	Dried	Organic	3114D-01
3114P-04	Mulberry	Dried	Organic	3114D-01
3114P-05	Sour cherry	Dried	Organic	3114D-01
3114P-06	Walnut	Dried	Organic	3114D-01
3114P-07	Pears	Dried	Organic	3114D-01
3114P-08	Beans	Grain	Organic	3114D-01
3114P-09	Tomatoes	Dried	Organic	3114D-01
3114P-10	Plum	Dried	Organic	3114D-01

3114P-11	Almonds	Dried	Organic	3114D-01
3114P-12	Mung Beans	Dried	Organic	3114D-01
3114P-13	Kidney Bean	Dried	Organic	3114D-01
3114P-14	Licorice Root	Dried	Organic	3114D-01

42-3120 SADEKO

Agricultural units:No	Unit name	Number of producers, hectar and crop		
3120F-01	Rin-Agro - Kherson	(b) (4) ha arable fields, 1 producer	Org	
3120F-03	Universal Expo - Kherson	ha arable fields, 1 producer	Org	
3120F-04	TOV Shestirnia - Dnepropetrovsk	ha arable fields, 1 producer	Org	
3120F-06	TOV Inter - Kherson	ha arable fields, 1 producer	Org	

Processors:

Ünit nr	Unit name	Process	Address
3120D-01	Sadeko Organic Itd.	Import-export, trader, forwarding, investment, documentation, finance, organizing farms and processors	14, Parovozna str, Kherson, Ukraine
3120D-02	PrAT "Dneprovskiy terminal"	Forwarding, transportation	169 Perekopskaya str., Kherson, Ukraine
3120D-12	Art Seed ltd.	Import-export, trading, documentation, financing	14, Parovozna str, Kherson, Ukraine
3120D-14	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelna Str., Kherson, Ukraine, 73011

Product no	Name product	Last product	Product Category	Status	Process no
3120P-01	Barley	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-02	Beans	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-03	Buckwheat	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-04	Chick-pea	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-05	Coriander	Seeds	A,D,E	ORG	3120D-01 - 14
3120P-06	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-07	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-08	Lentil	Seeds, grouts	A,D,E	ORG	3120D-01 - 14

3120P-09	Lupine	Seed	A,D,E	ORG	3120D-01 - 14
3120P-10	Millet	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-11	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-12	Oat	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-13	Peas	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-14	Pumpkin	Seeds, kernel	A,D	ORG	3120D-01 - 14
3120P-15	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-16	Rye	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-17	Sorghum	Seeds	A,D,E	ORG	3120D-01 - 14
3120P-18	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-19	Sunflower	Seeds, oil and cake/expeller, kernel	A,D,E	ORG	3120D-01 - 14
3120P-20	Wheat	Seeds, grouts, flour meal, bran, semolina	A,D,E	ORG	3120D-01 - 14

43 – 3121 EKOTURKA ETHIOPIA

Processors:

Unit No	Name Unit	Process	Address
3121D-02	Selamawit G/Mariam	Trade, import & export	Kirkos Sub City Odaa Tower Office no. 514 Addis
			Ababa, Ethiopia
3121D-03	GHTY General Trading PLC	Trade, import & export	Arada Sub City MK Building Office No. 509 Addis
	_		Ababa, Ethiopia

Production unit:

Unit No	Name Unit	Number of producers, total hectares and crops	Status
3121F-01	Gambella- Ethiopia	15 producers, ha, Sesame	
	Gambella- Ethiopia	13 producers ha, Mung bean	
	Gambella- Ethiopia	10 producers (b) (4) ha, Soybean	Organic
	Gambella- Ethiopia	15 producers ha, Sorghum	
	Gambella- Ethiopia	14 producer ha, Beans	Organic
	Gambella- Ethiopia	2 producer ha, Rice	Organic
	Gambella- Ethiopia	11 producer ha, Maize	Organic
	Gambella-Ethiopia	2 producer ha, peanuts	Organic

Product nr	Product	Final product	Status	Processing unit
3121P-01	Beans	Beans	Organic	3121D-01
3121P-02	Maize	Grains	Organic	3121D-01

3121P-03	Mung bean	Beans	Organic	3121D-01
3121P-04	Rice	Rice	Organic	3121D-01
3121P-05	Sesame	Seeds	Organic	3121D-01
3121P-06	Sorghum	Grains	Organic	3121D-01
3121P-07	Soybean	Beans	Organic	3121D-01
3121P-08	Peanuts	dry	organic	3121D-01

44-3122 DoCOTTON

Processors:

Unit nr	Unit	Process	Address		
3122-D01	DoCotton	Collect, filtering, ginning, pressing, transport	Fabric 300 Hocent Tacikistan.		

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
3122.F01	3122F1	(b) (4) ha cotton 103 contractor farmers	organic

Products:

Product nr	Product	Final product	Status	Processing unit
3122-P1	Cotton	Cotton	Organic	
3122-P2	Wheat	Wheat	Organic	

45-3126 EKOTURKA KIRGIZIA

Processors:

Unit nr	Unit	Process	Address
3126D-01	Zirve Teks	Trade, import & export	Jalal Abad-KYRGYZSTAN
3126D-02	EKOTURKA	Trade, import & export storing packing	Adıyaman Turkye

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status

3126F-01	Zirveteks, Ecoturca	1 Producers, (b) (4) Ha, Cotton Organic
3126F-01	Zirveteks, Ecoturca	1 Producers Ha, Wheat Organic
3126F-01	Zirveteks, Ecoturca	1 Producers Ha, Green Mung Beans Organic
3126F-01	Zirveteks, Ecoturca	1 Producers Ha Maize Organic

Product nr	Product	Final product	Status	Processing unit
3126P-01	Cotton	Cotton Ginned	Organic	3126D-01, 02
3126P-02	Wheat	Wheat Seed	Organic	3126D-01, 02
3126 P03	Green Mung Bean	Green Mung Bean Seed	Organic	3126D-01, 02
3126P-04	Maize	Maize Seed	Organic	3126D-01, 02

46-3127 EKOTURKA KAZAKHSTAN

Agricultural units:

-9.1-a.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1			
Unit No	Name Unit	Number of producers, total hectares and crops	Status
3127F-01	KH "DEL TV"	1 Üretici, (b) (4) ha Linseed, wheat,	Org
3127F-01	Agrocer	1 Üretici, (b) (4) ha, Linseed, wheat, Sunflower, Barley, Canola,	Org
3127F-01	Aziya Tarangul	1 Üretici, (b) (4) ha, Linseed, wheat, Barley, Oats, Canola, Peas, Buckwheat	Org
3127F-01	ASHAT AGRO	1 Üretici, ha, Linseed, wheat, Barley, Oats, Canola, Buckwheat	Org
3127F-01	AZIYA TARANGUL	1 Üretici, ha, Barley, canola, flax, peas, oats, wheat	Organik

Processors:

Unit nr	Unit	Process	Address
3127D-01	Qrient	Trade, import & export	Almaaty Kazakhistan
3127D-02	EKOTURKA	Trade, import & export storing packing	Adıyaman Turkye

Product no	Name product	Last product	Product Category	Status	Process no
3127P-01	Barley	Seeds	Α	Org	-
3217P-02	Buckwheat	Seeds	Α	Org	-
3127P-03	Canola	Seeds	Α	Org	-

3127P-04	Linen Seed	Seeds	А	Org	-
3127P-05	Oat	Seeds	Α	Org	-
3127P-06	Pea	Seeds	Α	Org	-
3217P-07	Sunflower	Seeds	Α	Org	-
3127P-08	Wheat	Seeds	А	Org	-

47-3128 EKOTURKA – RUSSIA

Production unit:

Unit No	Name Unit	Number of producers, total hectares and crops	Status
3128F-01	Agrofenovskaya	1 Farmer, (b) (4) Ha Linseed, Wheat, Maize, Sunflower, Barley, Millet, Chickpea	Org
3128F-02	Ametist	1 Farmer, Ha Wheat, Soybean, Maize, Sunflower, Barley, Mustard, Canola, Chickpea	Org
3128F-03	Krasniy Sad	1 Farmer, (b) (4) ha Linseed, Wheat, Soybean, Sunflower, Barley, Canola, Pea	Org
3128F-04	Rostov Mir,	1 Farmer, ha Wheat, Maize, Sunflower, Barley, Vetch	Org

Products

Product no	Name product	Last product	Product Category	Status	Process no
3128P-01	Barley	Seeds	A	Org	
3218P-02	Canola	Seeds	A	Org	
3128P-03	Chickpea	Seeds	A	Org	
3128P-04	Linseed	Seeds	A	Org	
3128P-05	Maize	Seeds	A	Org	
3128P-06	Millet	Seeds	A	Org	
3218P-07	Mustard	Seeds	A	Org	
3128P-08	Pea	Seeds	A	Org	
3128P-09	Sojabeans	Seeds	A	Org	
3128P-10	Sunflower	Seeds	A	Org	
3128P-11	Vetch	Seeds	A	Org	
3128P-12	Wheat	Seeds	A	Org	

48-3140 PRODEXIM

Processors:

Unit nr Unit name	Process	Address
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3140D-0	1 TOV Prodexim ltd.	Export, Trade, Transport, Storage, Finance 5,	, Port-Elevator, Kherson, 73000, Ukraine
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Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3140F-01	FX Ykos I K – Kherson	(b) (4) ha arable fields, 1 producer	Org
3140F-02	TD Prodexim – Kherson	ha arable fields, 1 producer	Org
3140F-03	FG Svitanok – Kherson	ha arable fields, 1 producer	Org
3140F-04	Imanuil Farm – Kherson	ha arable fields, 1 producer	Org
3140F-05	TOV Pioneer – Kherson	ha arable fields, 1 producer	Org
3140F-06	FH Viktoria-Askania – Kherson	ha arable fields, 1 producer	Org
3140F-07	TOV Kiselevka – Kherson	ha arable fields, 1 producer	Org

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3140P-01	Corn	Seeds	A,D,E	ORG	3140D-01
3140P-02	Peas	Seeds	A,D,E	ORG	3140D-01
3140P-03	Pumpkin	Kernel	A,D,E	ORG	3140D-01
3140P-04	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-05	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-06	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-07	Vegetables	Fresh	A,D	ORG	3140D-01
3140P-08	Wheat	Seeds	A,D,E	ORG	3140D-01

49-3141 EKOLIUM

Processors:

Ü	Init nr	Unit name	Process	Address

3141D-01	Ekolium, LLC.	Export, trade, administration, finance, organizing	9, Boryspilska str, building 21, Kiev, 02099,
		farms and processors, transport, storage	Ukraine

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
NA			

Products:

Product no	Name product	Last product	Status	Process no
3141P-01	Barley	Seeds, grouts, brans, flakes	A,D,E	3141D-01
3141P-02	Buckwheat	Seeds, grouts, flakes	A,D,E	3141D-01
3141P-03	Corn	Seeds, grouts, flour meal, flakes	A,D,E	3141D-01
3141P-04	Flax	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-05	Lupine	Seed	A,D,E	3141D-01
3141P-06	Millet	Seeds, grouts, flour meal, flakes	A,D,E	3141D-01
3141P-07	Mustard	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-08	Oat	Seeds, grouts, flakes, brans, flour meal	A,D,E	3141D-01
3141P-09	Peas	Seeds, grouts, flakes	A,D,E	3141D-01
3141P-10	Pumpkin	Kernel	A,D,E	3141D-01
3141P-11	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-12	Rye	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01
3141P-13	Sorghum	Seeds	A,D,E	3141D-01
3141P-14	Soybean	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-15	Spelt (wheat)	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01
3141P-16	Sunflower	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-17	Walnut	Kernel	A,D,E	3141D-01
3141P-18	Wheat	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01

50-3142 SRF ROSE

Processing Units:

1 recogning emiter					
Unit nr	Unit	Process	Address		

NA		
1		

Agricultural Units:

Unit nr	Unit	Total area, crops and farmers	Status
3142F-01	671, Daepyeong-ri, Gokseong-eup	(b) (4) ha Rose Production	Org
3142F-02	677-2, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
	678-2, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-04	678-7, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-05	1142-5, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-06	1178-5, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-07	1266-9, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-08	1265-9, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-09	, , ,	ha Rose Production	Org
3142F-10	1266-10, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-11	1266-12, Daepyeong-ri, Gokseong-eup	ha Rose Production	Org
3142F-12	227-1, Guwon-ri, Gokseong-eup	ha Rose Production	Org
	230-7, Guwon-ri, Gokseong-eup	ha Rose Production	Org
	248-1, Guwon-ri, Gokseong-eup	ha Rose Production	Org
	248-3, Guwon-ri, Gokseong-eup	ha Rose Production	Org
3142F-16	249-12, Guwon-ri, Gokseong-eup	ha Rose Production	Org
3142F-17	31-23, Sin-ri, Gokseong-eup	ha Rose Production	Org

Products:

	Product nr	Product	Final product	Status	Processing unit
Ī	3142P-01	Rose	Leaves	Org	-

51-3149 JMG

Processing Units:

Unit nr	Unit	Process	Address
3149D-01	JANGHUENG MUSANGIM CO.,LTDFactory	Processing of seaweed	1478, Jangheung-daero, Gwansan-eup, Jangheung-gun, Jeollanam-do, Korea

Agricultural Units:

Unit nr	Unit	Total area, crops and farmers	Status
3149F-01	Hanil: 10125, 10198, 10308, 10345, 10346, 10312, 10309, 10341, 10212, 10332, 10253	(b) (4) ha, Seeweed,4 Farmers	Org
3149F-02	Yongil: 10223, 10194, 10216, 10345, 10310	(b) (4) ha, Seeweed,3 Farmers	Org

Products:

Product nr	Product	Final product	Status	Processing unit
3149P-001	Organic seaweed	Organic Snack	Org	JANGHUENG MUSANGIM
3149P-002	Organic seaweed	Organic Sea Tangle Snack	Org	JANGHUENG MUSANGIM
3149P-003	Organic seaweed	Roasted Seasoned Seaweed	Org	JANGHUENG MUSANGIM

52- 3170 NT-NOVA LTD

Processing units:

	oning winter						
Unit nr	Unit	Process	Address				
3170D-01	NT-NOVA LTD	Import-export, trader, finance, investment, documentation, forwarding	11, Domostroitelnaya Street, 2 floor, office 203, Kherson, 73011 Ukraine				

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
NA			

Products:

Product nr	Product	Final product	Product category	Status	Processing unit
3170P-01	Barley	Seeds	A	ORG	3170D-01
3170P-02	Buckwheat	Seeds	A	ORG	3170D-01
3170P-03	Chickpea	Seeds	A	ORG	3170D-01
3170P-04	Corn	Seeds	A	ORG	3170D-01
3170P-05	Coriander	Seeds	A	ORG	3170D-01
3170P-06	Flax	Seeds	A	ORG	3170D-01
3170P-07	Lupine	Seeds	A	ORG	3170D-01
3170P-08	Millet	Seeds	A	ORG	3170D-01
3170P-09	Mustard	Seeds, Oil, cake	A,D,E	ORG	3170D-01
3170P-10	Oat	Seeds	A	ORG	3170D-01
3170P-11	Peas	Seeds	A	ORG	3170D-01
3170P-12	Pumpkin	Kernel	A	ORG	3170D-01
3170P-13	Rapeseed	Seeds, Oil, cake	A,D,E	ORG	3170D-01
3170P-14	Rye	Seeds	A	ORG	3170D-01
3170P-15	Sorghum	Seeds	A	ORG	3170D-01
3170P-16	Soybean	Seeds, Oil and Cake	A,D,E	ORG	3170D-01
3170P-17	Sugar beet	Cake/pulp	A,D,E	ORG	3170D-01
3170P-18	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3170D-01
3170P-19	Wheat	Seeds	A	ORG	3170D-01

53-3172 ART SEED ltd.

Processors:

Unit no	Unit name	Process	Address
3172D-01	Art Seed Ltd.	Import-export, trader, forwarding, investment,	14, Parovozna str., Kherson, 73000,
31720-01	Art Seed Ltd.	documentation, finance, organizing farms and processors	Ukraine
3172D-02	PrAT "Dneprovskiy terminal"	Storage, Transshipment, Forwarding	169 Perekopskaya str., Kherson, Ukraine
3172D-04	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelna Str., Kherson, Ukraine, 73011

Agricultural units:

Unit No	Unit name	Number of producers, hectar and crop	Status
3172F-01	Triel-Agro - Kherson	(b) (4) ha arable fields, 1 producer	Org
3172F-02	FG Diana - Kherson	ha arable fields, 1 producer	Org

3172F-03 STOV "Bereginya" - Kherson	(b) (4) ha arable fields, 1 producer	Org
3172F-04 TOV "Preobrazhenske" - Zaporojie	ha arable fields, 1 producer	Org

Products:

Product no	Name product	Last product	Product	Status	Process no
			Category		
3172P-01	Barley	Seeds, grouts	A,D,E	ORG	3172D-01 - 09
3172P-02	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3172D-01 - 09
3172P-03	Millet	Seeds, grouts, flour meal	A,D,E	ORG	3172D-01 - 09
3172P-04	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3172D-01 - 09
3172P-05	Sorghum	Seeds	A,D,E	ORG	3172D-01 - 09
3172P-06	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3172D-01 - 09
3172P-07	Sunflower	Seeds, oil and cake/expeller, kernel	A,D,E	ORG	3172D-01 - 09
3172P-08	Wheat	Seeds, grouts, flour meal, bran, semolina	A,D,E	ORG	3172D-01 - 09

54-3180 KAZECOTRADE LTD.

Processing units:

Unit nr	Unit	Process	Address
3180D-01	Kazecotrade ltd.	Import-export, Trader, Documentation, Finance, Investment, Forwarding, Transshipment, Organizing farms and processors, Storage	13, Koktem dist., Of.71, Kokshetau, Akmolinskiy region, Republik Kazahstan, 02222

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3180F-01	TOO "Raisovskoe"	(b) (4) ha arable fields, 1 producer	Org
3180F-02	KH "Zhumagulov"	ha arable fields, 1 producer	Org
3180F-03	TOO "Boris-Romanovskoe"	ha arable fields, 1 producer	Org
3180F-04	KH "Asar"	ha arable fields, 1 producer	Org

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3180P-01	Barley	Seeds, grouts	A,D	ORG	3180D-01
3180P-02	Flax	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-03	Oat	Seeds, flour	A,D	ORG	3180D-01
3180P-04	Peas	Seeds, grouts	A,D	ORG	3180D-01

3180P-05	Potato	Fresh	A,D	ORG	3180D-01
3180P-06	Rapessed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-07	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-08	Wheat	Seeds, grouts, flour	A,D	ORG	3180D-01

55-3193 OJSC Vinnytsa Oil-and-Fat-Production Plant

Processing units:

Unit nr	Unit	Process	Address
3193D-01	OJSC Vinnytsa Oil-and-Fat- Production Plant	Import-export, trader, finance, documentation, forwarding, investment, Process of oil and cake	26, Nemyrivske Shosse, Vinnytsa, 21034, Ukraine

Agricultural units:

	9				
Unit nr	Unit	Total area, crops and farmers	Status		
NA					

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3193P-01	Rapeseed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01
3193P-02	Soybean	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01
3193P-03	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01

56-3194 LLC NIKMORSERVICES NIKOLAEV

Processing units:

Uni	t nr	Unit	Process	Address
3194	D-01 L	LLC "NIKMORSERVICES NIKOLAEV"	Import-Export, Trader, Finance, Documentation, Forwarding, Investment	1/1, Grazhdanskiy spusk, Nikolaev, 54002, Ukraine

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3194P-01	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3194D-01

57-3195 AGRO SUPPLIES LLC.

Processing units:

	9		
Unit nr	Unit	Process	Address
3195D-01	"Agro Supplies" LLC.	Import-Export, Trader, Finance, Documentation, Forwarding, Investment	27, Kaunasskaya str., Kiev, 02160, Ukraine

Agricultural units:

7.911041141414141				
Unit nr	Unit	Total area, crops and farmers	Status	
-				

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3195P-01	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3195D-01

 From:
 Mann, Renee - AMS

 To:
 Crail, Lars - AMS

 Subject:
 RE: ETKO audit

Date: Thursday, January 15, 2015 5:40:00 PM

Thanks!

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: Thursday, January 15, 2015 5:37 PM

To: Mann, Renee - AMS Subject: RE: ETKO audit Onsite from the 12 – 16 May

From: Mann, Renee - AMS

Sent: Thursday, January 15, 2015 5:25 PM

To: Crail, Lars - AMS **Subject**: ETKO audit

Hi Lars –

Can you please confirm the dates of the ETKO audit? Was it May 12-14?

Thanks, Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

Join the NOP mailing list.

 From:
 ma@etko.org

 To:
 Mann, Renee - AMS

Subject: RE: Registered: Annual Report Acknowledgement

Date: Monday, March 10, 2014 11:36:24 AM

Dear Renee

Thank you for confirmation.

Have a nice day,

Mustafa

From: Renee.Mann@ams.usda.gov [mailto:Renee.Mann@ams.usda.gov]

Sent: Monday, March 10, 2014 4:38 PM

To: ma@etko.org

Subject: Registered: Annual Report Acknowledgement

RPost Registered Email



This is a Registered Email[®] message from Mann Renee - AMS.

Dear Dr. Akyuz:

Thank you for the submission of your annual report. The USDA National Organic Program has reviewed your report and found that ETKO has adequately complied with the annual reporting requirement. Please contact me with any questions you may have.

Sincerely,

Renee

Ms. Renee Mann

Accreditation Manager

USDA National Organic Program

(202) 260-8635 (Note new phone number)

NOP website

Sign up for our newsletter, the USDA Organic Insider.

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Click here to send a Registered Email® message to anyone.

 From:
 Mann, Renee - AMS

 To:
 Lusby, MaryLou - AMS

Subject: RE: Review of Annual Report for ETKO

Date: Monday, February 09, 2015 7:59:00 AM

Attachments: image001.png

Thank you, Mary Lou.

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

Sent: Friday, February 06, 2015 2:32 PM

To: Mann, Renee - AMS

Subject: Review of Annual Report for ETKO

Rene,

I have finished reviewing the <u>Annual Report for ETKO</u>. The documentation has been saved in there folder.

Thank you

Mary Lou Croisetiere



Mary Lou Croisetiere | Program Specialist, National Organic Program
USDA AMS | 100 Riverside Parkway Suite 101 Fredericksburg VA 22406 540-361-2712

MaryLou.Lusby@ams.usda.gov

 From:
 ma@etko.org

 To:
 Zuck_Penelope - AMS

Cc: <u>Claypool Rebecca E - AMS; AMS - AIAinbox; AMS - NOPAppeals</u>

Subject: RE: Registered: Notice of Non-compliance - AIA6155PZ

Date: Sunday, July 03, 2016 11:16:43 AM

Attachments: <u>~WRD389.jpg</u> image001 png

20160704 Corrective Action Letter NC.pdf

GP 11 Use of Logo, Licences, Mark of Conformity.Rev01.pdf

GP 13 F 03 NOP Certificate Rev 07.pdf GP 18 NOP Certification Procedure.Rev03.pdf OP 01 F 33 Assesment Label NOP.pdf

Ms Zuck

You can find attached corrective actions we took. Updates are indicated with blue color.

Sincerely

Mustafa Akyuz

ETKO Turkey T+90-232-3397606 F+90-232-3397607 www.etko.org

From: Penelope.Zuck@ams.usda.gov [mailto:Penelope.Zuck@ams.usda.gov]

Sent: Tuesday, June 21, 2016 3:51 PM

To: ma@etko.org

Cc: Rebecca.E.Claypool@ams.usda.gov; AlAinbox@ams.usda.gov; NOPAppeals@ams.usda.gov

Subject: Registered: Notice of Non-compliance - AIA6155PZ



This is a Registered Email[®] message from **Zuck Penelope - AMS**.

Dear Dr. Akyuz,

Please see the attached Notice of Noncompliance to the USDA organic regulations. Corrective actions are due within 30 days of receipt of this notice. If you have questions on this notice, please do not hesitate to contact me.

Best 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 | Join the NOP mailing list

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Ekolojik Tarım Kontrol Organizasyonu Ltd Şti 160 sk No: 13/7 35040 Bornova – İzmir

Tel: +90-232-3397606 Fax:+90-232-3397607 Email: info@etko.org www.etko.org

Ref No: 2016070401

Subject: NONC AIA6155PZ.NC1

Date: July 04, 2016

Ms Zuck

To avoide reoccurance of violation of the certification requirements of NOP we updated following procedures and the certificate.

You can find attached;

1-Corrected NOP certificate template

2-GP 18 NOP Certification Procedure Point 7.5.2

3-GP 11 Use of Logo and Liceses; point 5.2 Labelling requirements According to NOP.

4-OP 01 F 33 Assessment Lable NOP Point Subpart D

Sincerely.

Dr. Mustafa AKYÜZ Gn Md.



Tel: 0232-3397606

Fax: 0232-3397607

Email: info@etko.org

http: www.etko.org

Tax office: Bornova Tax No: 381 023 6931 Chamber of commerce No: 92592,1 Bank Türkiye İşbankası Bornova Şubesi Accaunt Euro: T.lira:



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1. PURPOSE

ETKO exercises proper control over ownership, use and display of licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is certified according to this procedure. 4.1.3.1

2. RESPONSIBILITIES

Inspection division is responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

GP 18 NOP Certification Procedures
GP 23 Private Standards Certification

5. APPLICATION

5.1. Use of the ETKO Logo

ETKO has established its own logo.

- ETKO licensees (including importers) can use ETKO Logo for all the organic programs that ETKO offers
- Clients are not required to use ETKO logo on any product sold, labeled, or represented as organically produced as a condition of certification; and
- Clients are not required to comply with any production or handling practices other than those stated in the regulations in order to use ETKO's identifying mark.

ETKO's logo represents the integrity of its certified organic products. The use of this logo on ETKO certified organic products, in the form of a label mark, is an option that is available to interested certified parties upon the execution of a separate agreement.

After the certification decision has been taken by ETKO, ETKO will inform its operator that he can use the labels on his organic product(s).

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This label mark has been designed for the specific purpose of providing promotional identification of ETKO certified products. Products with a mark of ETKO show that the product so labeled has been certified organic to the uniformly high standards.

ETKO Logo may be used by the clients (operators including importers) with the permission of ETKO, for general labeling requirements which are applicable for raw, processed or finished products, in different sizes unless the proportion does not change.

- 1. ETKO Logo may be used on the packages and over products
- 2. ETKO Logo may be used compliance certificates

In the following cases ETKO logo cannot be used:

- 1. For the activities and addresses which are not in the certification program.
- 2. Infringement
- 3. For promotional tools such as pen, notebook, lighter etc

According to NOP Exception: ETKO certified production or handling operations within a State with more restrictive requirements, approved by NOP, shall require compliance with such requirements as a condition of use of its identifying mark by such operations. ETKO will accept only raw material or ingredients from other NOP accredited certifiers but will not allow these operators to use the ETKO mark, unless their products go through the ETKO application and review process.

5.1.1 Use of mark by non-certified brand owner (According to COR)

When under its own brand a company distributes products provided by a supplier to whom certification is granted by ETKO, this means that the company uses ETKO's mark to market these products. Thus even though the company itself possesses no certificate for its private brand products, ETKO shall require that the company:

- a) inscribe on the packaging of products being resold under a private brand, a reference to the certified product supplier, indicated such that the supplier may be identified by both the competent authority and ETKO concerned;
- b) maintain a registry of all certified products received from the supplier, distributed, and eventually sold under either one or more previously approved labels;

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c) accept that ETKO whose name is indicated on product labels be allowed to inspect these records when required and that records kept allow product movement to be traced, from the entry point (reports concerning products obtained from suppliers) up until a product leaves the premises (product sales reports and inventory reports).

5.1.2 Use of mark by sub licensee (According to COR)

Company producing a product exclusively for a company that holds the certificate in order to market it:

When a company does not hold a certificate but has an exclusive affiliation with the operator it supplies, and the operator holds the compliance certificate for the products being supplied, then the compliance mark will only be used on labels of those products it packages, in an exclusive manner for the supplier and on a site falling under its responsibility.

A company will inform officially ETKO about the identity of any other company for which it intends to manufacture products under license, and thus as a result can use the ETKO's mark (name and logo) on the label of the products that it intends to market under its own brand name even though it does not hold a compliance certificate for those products.

5.2 Labeling Requirements

Clients must meet the following criteria:

- The percentage statement of organic ingredients on the product package appears in letters that do not exceed one-half the size of the largest type on the panel on which the statement is displayed, and appears in its entirety in the same type size, style, and color without highlighting;
- Clients who produce the finished product maintain records verifying the organic certification of the operations of organic raw materials or organic ingredients; and
- Clients do not individually display ETKO seal or mark more prominently than the official seals such as USDA, COR.

According to COR: A company producing and marketing an ETKO certified product in addition to supplying to another company that holds a certificate in order to market it as well:

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When in a nonexclusive manner a company supplies a client that has obtained a certificate from a certifier for products being marketed under a private brand, and this company already holds for its products a certificate granted by another certifying body, ETKO's mark will only be used on labels placed on products prepared and packaged for this client, on a site falling under the company's responsibility, and as a result of an extension to the license granted to this client by ETKO.

According to NOP:

Labeling category for each product certified under the handling/processing certification category (not required for products in the crops, wild crops, or livestock certification categories). Labeling categories: 100% Organic, Organic, Made with Organic (specified ingredients or food groups), and Livestock Feed (Organic or 100% Organic);

Clients (operators including importers) who produce or handle products labeled "organic" shall denote each organic ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced.

Client (operators including importers) must have indicate, below the information identifying the handler or distributor of the product and proceeded by the statement, "Certified organic by ETKO ..," or a similar phrase, the name of the certifying agent that certified the handler of the finished product is identified.

Clients (operators including importers) may use the following terms;

- The term, "100 percent organic" or "organic," as applicable, as the name of the product is identified.
- For products labeled "organic," the percentage of organic ingredients in the product.
- The term, "organic," to identify the organic ingredients in multi-ingredient products labeled "100 percent organic."
- The USDA seal.
- The ETKO logo and identification of any other certifying agent which certified production or handling operations of raw organic product or organic ingredients used in the finished product.

The packages labeled "made with organic (specified ingredients or food group(s))" shall not display the USDA seal.

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Some activities undertaken by applicants in regard to this section are permissive. Agricultural products in packages labeled "made with organic (specified ingredients or food group(s))" may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product, the following information, providing all other conditions are met: (For NOP §205.304)

- A statement, "made with organic (specified ingredients)."
- A statement, "made with organic (specified food groups)."
- The seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.

5.3. Multi ingredient packaged products with less than %70 organically produced ingredients

When an agricultural product contains less than 70 percent organically produced ingredients; the client will do the followings:

- Each organically produced ingredient in the ingredient statement will be explained with the word, "organic," or an asterisk or other reference mark will be used meaning of which is explained below the ingredient statement to indicate the ingredient is organically produced.
- The product's percentage of organic contents on the information panel will be identified when the organically produced ingredients are identified in the ingredient statement.
- USDA seal or ETKO seal, logo, or other identifying mark which represents organic certification of a product or product ingredients must NOT be applied.

5.4. Agricultural products produced on exempt or excluded operations: (According to NOP)

Exempt and excluded operations that an agricultural product organically produced or handled on such operations **must not**:

- Display the USDA seal or ETKO seal or other identifying mark which represents the exempt or excluded operation as a certified organic operation; or
- Be represented as a certified organic product or certified organic ingredient to any buyer.

An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient only in a multi

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ingredient product produced by the exempt or excluded operation; it cannot be identified as organic for the other operations.

Exempt and excluded operations that an agricultural product or ingredient organically produced or handled on such operations **must not** be identified or represented as "organic" in a product processed by others.

Such product is subject to requirements specified in §205.300(a) [use of the term "organic"] and §205.301(f) (1) through (7) [allowed and prohibited materials and practices].

Any production or handling operation that sells agricultural products as organic whose gross income from such sales is less than the limits defined in legal documents is exempt from certification. These operations, however, must still comply with the applicable production and handling requirements

Upon the application review of such operations if it is determined that the monetary and handling requirements for exemption are provided, the applicant will be formally notified immediately of its exempt status. This notification will also include the requirements for compliance of the operation as noted in the above paragraph.

Excluded operations are those operations who only sell organic products which are received in their final packaged state and remain so without being further processed, retail food establishments that process, on the premises, raw and ready to eat food previously labeled as 100% organic, "organic", or "made with organic (specified ingredients or food groups).

5.5. Misuse of logo and marks, false claims

Incorrect references to the certification scheme or misleading use of licenses, certificates, marks, or any other mechanism for indicating a product is certified, found in documentation or other publicity shall be dealt with by suitable action as follows. 4.1.3.2

Misuse of logo, false claims and false use of the mark, incorrect references to the certification system or misleading use of licenses, certificates or marks (GOTS, COR, EU...) found in advertisements, catalogues etc will result in a major Non-Conformance. In such a case the client shall be formally requested to take urgent corrective action to eliminate the nonconformity and otherwise ETKO shall proceed for the withdrawal of certification, publication of transgression and, if necessary, other legal action.

In case ETKO certification and / or mark of conformity is used in anyway by third party, a formal notification shall be sent immediately to such user and legal action shall be taken accordingly

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Where ETKO has a substantiated suspicion that an operator intends to place on the market a product not in compliance with the organic production rules but bearing a reference to the organic production method, ETKO sends a notification to the operator requiring that the operator may provisionally not market the product with this reference for a time period to be set by ETKO. Before taking such a decision, the operator is allowed to comment on the subject. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if ETKO is sure that the product does not fulfil the requirements of organic production.

5.6. USDA seal

Clients may use the USDA seal only for raw or processed agricultural products meeting the requirements for "100 percent organic" or "organic," as described in the labeling regulations.

Client shall replicate the form and design of the USDA seal according to the following requirements:

- On a white background with a brown outer circle and with the term, "USDA," in green overlaying a white upper semicircle and with the term, "organic," in white overlaying the green lower half circle; or
- On a white or transparent background with black outer circle and black "USDA" on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.
- The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.

5.7 Labeling requirements according to TC Regulation 27676/2010 (Article 29)

- Organic final packed products imported or not produced according to this regulation cannot be labeled with TC LOGO.
- Raw material imported and re-processed and packed in Turkey can be labeled with TC LOGO as long as the raw product is certified in the country of production according to organic production regulation. In such cases country of production must be mentioned.
- Labeling of organic products according to TC Regulation requires following:
 - Name of the producer/processor
 - Reference to TC regulation and TC Logo
 - Name of the certifier code nr and its logo

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- Certificate nr
- Reference to organic, biological (bio), ecological (eco)
- Labeling of in conversion organic products according to TC Regulation requires following:
 - Products produced and completed minimum 12 months of conversion period according to TC regulation can be labeled as in conversion to organic farming
 - No TC logo can be used for IC products labels
 - Name of the producer/processor
 - Name of the certifier code nr and its logo
 - Certificate nr

5.8 Labeling requirements according to IACB "Equivalent European Organic Production and Processing Standard for Third Countries" (Article 9)

In the labeling and advertising of live or unprocessed agricultural products, terms referring to the organic production method may be used only where, in addition, all the ingredients of that product have also been produced in accordance with the requirements laid down in **IACB** Standard.

No products contains or produced from GMOs can be labeled according to IACB Standard.

The processed food can be labeled according to this Standard;

- -complies with IACB Standard,
- -at least 95 % by weight, of its ingredients of agricultural origin are organic;
- -only in the list of ingredients, provided that the food complies with Article 7.4 of

IACB;

The list of ingredients shall indicate which ingredients are organic.

Compulsory indications:

Code nr of control body

Community logo

Raw material country of production. In this case following forms of indication as appropriate shall appear in the same visual field as the logo:

"EU Agriculture", where the agricultural raw material has been farmed in the EU;

"non-EU Agriculture", where the agricultural raw material has been farmed in third countries;

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"EU/non-EU Agriculture", where part of the agricultural raw materials has been farmed in the Community and a part of it has been farmed in a third country.

The abovementioned indication "EU" or "non-EU" may be replaced or supplemented by a country in the case where all agricultural raw materials of which the product is composed have been farmed in that country.

For the abovementioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin.

The abovementioned "EU" or "non-EU" indication shall not appear in a color, size and style of lettering more prominent than the sales description of the product.

The indications referred to in paragraph above shall be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.

Organic production logos:

Community Organic production logo may be used in the labeling, presentation and advertising of products which satisfy the requirements set out under IACB Standard. The Community logo shall not be used in the case of in conversion products and food. In-conversion products of plant origin may bear the indication 'product under conversion to organic farming' provided that:

- (a) a conversion period of at least 12 months before the harvest has been complied with;
- (b) the indication shall appear in a color, size and style of lettering which is not more prominent than the sales description of the product, the entire indication shall have the same size of letters;
- (c) the product contains only one crop ingredient of agricultural origin;
- (d) the indication is linked to the code number of the control body

5.9 Private Standard Certification Schemes Logo Use

Private standards such as GOTS, TE, COSMOS or other similar ones apply to use their own logo as following the rules described by each different standard. GOTS described the logo use in its Labeling Guide. TE described as well how to use TE logos in its Standards. COSMOS Labeling and logo use is described in Cosmos Standard Labeling Guide.

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CERTIFICATE

Certificate of Organic Operation

No: XXXX.XX.XXX.NOP

Issued to XXXXXX

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/PROCESSING, CROPS, WILD CROPS

Product Category:

100% Organic (&205.301 a); Organic (&205.301 b); Made with Organic (&205.301 c);

	(), - 3 (
Product no	Name product	Product Category			

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 surrendered, suspended or revoked.

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, XX.XX.2015

XX.XX.XXXX XX.XX.XXXX XX.XX.XXXX



On Behalf of ETKO:

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ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Şti.

ISO 17065 INSPECTION & CERTIFICATION PROCEDURE FOR ORGANIC PRODUCTS

Prepared by
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1. Introduction

ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Sti prepared the certification procedure as a part of the Quality Management System in order to overcome the expectations and needs of the clients. The purpose of this procedure is to determine the methods for the certification scopes requested by the applicants for their products, starting from the first contact up to the certification decision taken.

After clients application is received an offer is made, after acceptance of the offer a contract is signed, following contracting phase evaluation is realized before certification decision is taken. In order to keep compliance with the certification rules subsequent surveillance Inspection are realized.

This procedure is updated in case of changes in the regulations of certification to keep compliance. The procedure could be updated incase program changes realized within the ETKO management system.

ETKO quality management system complying International Standard "EN ISO 17065" was prepared in order verifying compliance for the products applicants willing to apply for a specific standard or regulation. This procedure applies within the framework of the certification standard(s) applied for. EN ISO 17065 describes the requirements for the certification bodies for conformity assessment of the products.

ETKO prepares guides to inform applicants willing to apply for their products evaluation complying a certain standard within the accreditation scope.

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2. Approval and Quality Management:

ETKO top management undertakes full responsibility of the quality management system, therefor appoints a QMR Quality System Responsible who irrespective of other responsibilities, have responsibility and authority to ensure that processes and procedures needed for the management system are established, implemented and maintained.

ETKO Managing Director and Quality Management Responsible declares that the content of the Quality Manual is reviewed and it complies with the requirements of legal regulations.

3. Distribution List

Controlled copies of this QM are distributed to

- 1. Managing Director MD
- 2. Certifier
- 3. Quality Manager QM
- 4. Quality Manager Assistant QMA
- 5. Accreditation body AB

The original of Quality Manuel is kept by QM.

The QM and QMA keep their QM copies in a safe place, enabling the access of inspectors or any other personnel, in need.

4. Purpose

This procedure defines the administrative aspects of application, evaluation and certification process for NOP National Organic Program.

5. Responsibilities

Managing Director, Quality manager, Certifier and Inspectors are responsible for the proper implementation of this procedure

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6. Records and Reference Procedure:

Records related to Certification Procedure is listed in Document Master List "SP 01 F 03" section "FORMS"

Procedures implemented for application, evaluation, review, certification, surveillance and sanctions are listed in Document Master List "SP 01 F 03" section "PROCEDURES"

GP 18 F 01	Organic Compliance Plan – process	
GP 18 F 02	Organic Compliance Plan – agricultural	
GP 18 F 05	Organic Compliance Plan - wild collection	
GP 18 F 06	Organic Compliance Plan – Feed Stuff Process	
GP 18 F 10	Notification of Noncompliance form (NONC)	
GP 18 F 11	Notification of Noncompliance Resolution (NONCR)	
GP 18 F 12A	Notification of Denial of Certification Application Review (NODC)	
GP 18 F 12B	Notification of Denial of Certification before Certification (NODC)	
GP 18 F 13	Notification of Proposed Suspension (NOPS)	
GP 18 F 14	Notification of Suspension (NOS)	
GP 18 F 15	Notification of Proposed Revocation (NOPR)	
GP 18 F 16	Notification of Revocation (NOR)	
GP 18 F 17	Reinstatement Request Letter From Suspended Operation to USDA	
GP 18 F 18	ETKO Reinstatement Request Letter for Suspended Operation to USDA	
GP 18 F 20	Surrender NOP Certification Letter	

GP 07 Fees procedure

GP 11 Use of Logo and License,

OP 03 Testing

OP 10 OCP processing guidance

OP 11 OCP agriculture guidance

TI 05 Sampling Method

TI 40 NOP Guide Testing & Enforcement Actions

7. Certification Requirements

7.1. General

ETKO operates under USDA Accreditation for NOP Regulation. The requirements against which the products of a client are evaluated according to NOP regulation.

The explanations required as to the application of these documents for NOP certification, are formulated by ETKO technical persons, possessing the necessary technical competence, and they are available to ETKO website www.etko.org.

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Applicants can download ETKO documents from the ETKO website www.etko.org and the NOP regulations from USDA website section National Organic Program: www.ams.usda.gov.

The designed objective of this certification process is to assure compliance to NOP requirements by developing a thorough understanding of the applicant and its operation. ETKO requires its clients to:

- Comply with all applicable NOP standards and requirements
- Establish, implement, and update annually an organic production or handling system plan;
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices;
- Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State official, and the certifying agent access to such records during normal business hours for review and copying to determine compliance with the regulations;
- Submit the applicable fees charged by the certifying agent; and
- Immediately notify the certifying agent concerning any:
 - o application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
 - change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.
- All applicants, upon request for certification, will receive an application packet, which includes
 fee structures, a copy of the NOP Final Rules, required documentation and other information
 deemed pertinent to certification.

Applicant is required to provide all the documents, plan, records and information to ETKO to complete the application processes.

NOP regulation shall be used as standard in the inspection, in the application of accept/ reject criteria, record keeping requirement. The inspector shall carry his/her own controlled copy of NOP regulation.

ETKO is responsible to provide NOP Regulation to its clients. In case, demanded NOP Regulation may be downloaded from the website. www.etko.org

Once the operator is certified the certificate stays valid unless it is cancelled, withdrawal or suspended by ETKO or AMS or surrendered by the operator.

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7.2. Application

Application process begins with the applicant providing all the information requested by the inspection information form (GP 01 F01) which must be initially completed by all those seeking certification. While this process is designed to be sufficiently through to secure the documentation necessary to verify the applicant's organic status, it is also designed to be relatively straightforward.

The primary purposes of the initial application are (1) to establish the applicant's eligibility, (2) define specific certification procedures, (3) estimate certification fees and (4) provide a reference for the independent ETKO inspector.

All applicants are required to complete the initial application process. Applicants are required to provide sufficient additional information to substantiate the baseline history of their organic status; including previous certification information where available.

The legal and statutory documents, related standards together with the certification procedures are sent to applicant by ETKO following the initial application of the client.

Applicants are encouraged to ask pertinent questions, which will enhance the ease, speed and accuracy of their application process

Upon receipt of the inspection information form (GP 01 F01), ETKO's staff performs a thorough review. The submitted information is initially screened to determine whether it meets the basic requirements for certification. Involved in this process is a comparison of the application information with applicable organic standards.

Under normal circumstances, the applicant will receive notification of its application status within 10 working days.

However, additional information, or correction of minor deficiencies may be required at this time. In such a circumstance, the application process is detained until sufficient information and documents are provided to develop an adequate level of confidence that proceeding with the certification is in the best mutual interest.

If the initial application is not accepted, the applicant is so notified with an explanation of those major deficiencies, which resulted in the rejection. In this case, the applicant is encouraged to correct the noted deficiencies and re-apply by submitting a new application

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7.2.1. Contract

If the initial application is accepted, ETKO offer containing a complete itemization of estimated fees is prepared for certification. Offer is to be approved by the applicant before the applicant is issued an application number, and a Contract (GP 01 F02). After the mutual approval of this contract the applicant is scheduled for the initial third party inspection.

Contract signed is valid until voluntary withdrawal, suspension or cancellation of the contract by ETKO or ministry of agriculture responsible bodies.

When the contract is signed, client is requested to submit the application package.

In case the initial application is under contract, then the applicant is requested to proceed to further phases, as instructed by ETKO.

7.2.2. Application Package

Clients must meet all applicable requirements of the National Organic Program when applying for certification. Each production or handling operation or portion of an operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold as "organic" **must** be certified and **must** meet all other applicable requirements of the National Organic Program.

7.2.2.1 Content of Application Package

Client together with the below mentioned documents submits to ETKO appropriate GP 18 F01 to GP 18 F 07 forms, duly filling.

- (a) An organic production or handling system plan, as required in §205.200;
- (b) The name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf;
- (c) The name(s) of any organic certifying agent(s) to which application has previously been made; the year(s) of application; the outcome of the application(s) submission, including, when available, a copy of any notification of noncompliance or denial of certification issued to the applicant for certification; and a description of the actions taken by the applicant to correct the noncompliance noted in the notification of noncompliance, including evidence of such correction; and
- (d) Other information necessary to determine compliance with the Act and the regulations

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• Applicant must have documented policies and procedures for excluding agricultural products from organic sale, if tests results are more than 5% of the EPA tolerance.

(Not: Applicant and ETKO will allow the applicable State official, or the AMS Administrator to conduct investigations to determine the cause of prohibited substances.)

7.2.2.2 Farming operations:

- production records from the three prior years for both the producer and for the hectare producing the crop seeking certification;
- detailed soil improvement plan as providing minimum soil tillage without leaving the fields unattended,
- pest management strategies for the crops being produced;
- A production plan including all details used to calculate estimated yields and production.

7.2.2.3 Processing and Handling Facilities:

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities are also required to undergo inspection and certification this package includes

- chain of custody documentation to verify inputs as being organically grown;
- details on the mechanics of the processing operation;
- Details on process management controls, including contamination prevention, pest management and sanitation's controls.

The application process is completed with the above mentioned information and documents supplied to the certification body.

Facilities dealing with processing activities described by NOP to be certified separately which cannot be certified as subcontractor under the umbrella organization. However there are operations involved with only storage and transport could be subcontracted and inspected under the certified operators. In this case organic system plan of the operator should include these operations activities. See more details TI 48 NOP Certification of Subcontracted Operations

7.3 Application Package Review

Application review is conducted by a competent person assigned by ETKO, who has the adequate technical knowledge and experience on general agriculture and organic agriculture.

Application review consists following:

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- A review to ensure that the application is complete as per ETKO procedures and other legal or statutory requirement.
- A determination of whether the applicant appears to comply or may be able to comply with the relevant applicable requirements of the production and handling standards;
- Verification that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any noncompliance's identified in the notification of noncompliance or denial of certification; and
- The scheduling of an on-site inspection of the operation to determine whether the
 applicant qualifies for certification if the review of application materials reveals that the
 production or handling operation may be in compliance with the applicable
 requirements.

Result of application package review is recorded on the application package review form (GP 02 F 01) and is sent to the client to take the remedial actions, if any. Any noncompliance observed is informed to the applicant, recorded on NONC (GP 18 F10)

Within a reasonable time, ETKO

- (1) Reviews the application materials received and communicate its findings to the applicant;
- (2) Provides the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed; and
- (3) Provides the applicant with a copy of the test results for any samples taken by an inspector.

Notes:

- 1. The applicant may withdraw its application at any time.
- 2. An applicant who withdraws its application is liable for the costs of services provided up to the time of withdrawal of its application.
- 3. An applicant that voluntarily withdrew its application prior to the issuance of a Notice of Noncompliance (NONC) (GP 18 F10) will not be issued a notice of noncompliance. Similarly, an applicant that voluntarily withdrew its application prior to the issuance of a Notification of Denial of Certification will not be issued a Notification of Denial of Certification

The client who completed the application phase is included on the inspection plan, and at all proceeding activities ETKO certification requirements and procedures are implemented.

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7.3.1 Organization of APPLICANT for Inspection

Prior to the scheduled inspection, the applicant is expected to have organized all of the records, which documents that, the commodities and / or processes under review are certifiable as organic. The applicant's co-operation in completing all of the forms, providing thorough and proper documentation, and being prepared, will greatly contribute to the timely and cost effective completion of the entire certification process. Delays to this process could lead, as a matter of course, to an increased cost (which would be borne by the applicant) of the overall certification.

While laws at the national level require the maintenance of these records, good business practice demands them. The applicant is reminded that documentation must be clear, complete and concise. Otherwise, an inspector may be unable to complete the inspection, as instructed, if sufficient information to verify the requisite status is not clearly provided. Unannounced inspections may be organized during the production and processing period to the applicant's agricultural production and processing units.

7.3.2 Ongoing Audit Monitoring of Records:

The program's comprehensive record keeping requirements, which direct a certified entity to maintain production input, and commodity tracking records on a current and continuing basis, provide Audit monitoring compliance.

Production inputs consist of anything that is instructed to, added to, or done in the process of creating a product. Commodity tracking consists of the mechanism by which anything that moves from the certified entity's operation into the distribution chain is quantitatively followed.

All of this information shall be maintained in an "auditable" form so that, should a full audit be required, information will be sufficiently presentable so as not to jeopardize the existing certification status which could result from un-audit ability of the record.

Applicants shall maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold as "organic", or "made with organic (specified ingredients."

The client shall keep records according to the following procedure:

- Clients' records are adapted to the particular business that the certified operation is conducting;
- Clients' records fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;

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- Clients' records are maintained for not less than 5 years beyond their creation; and
- Clients' records are sufficient to demonstrate compliance with the regulations
- The client shall make its records available for inspection and copying during normal business hours by authorized representatives of the Secretary, State official, and ETKO.
- As well as applicants, ETKO maintains all records required by §205.510(b) and makes all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State official;

During the independent third party inspection, a thorough review of this record keeping system is performed to verify that they are being maintained in accordance with the terms and conditions of the program.

To facilitate the compliance with this requirement, the program's monitoring structure has the designed flexibility to accommodate a variety of independent reporting formats. Upon approval by ETKO, the applicant's existing record keeping system may be utilized. In this manner, the applicant is able to produce the required information in a familiar format while eliminating additional, redundant and unfamiliar form-filling efforts.

These record keeping requirements are fundamental to the overall certification process. For this reason, failure to maintain this necessary documentation can result in temporary suspension, or outright cancellation of certification until compliance is re-established.

If, in the judgment of ETKO, a full audit is deemed necessary, such would be performed by an ETKO designated accounting firm under terms and conditions specified in the Certification Agreement. Every effort would be made to schedule the audit as quickly as possible, and at a time of mutual convenience, to minimize delays in proceeding with full certification.

7.3.3 Time of the Essence

Both the applicant and ETKO have obligations to each other to assure that the certification process advances quickly and efficiently. The applicant is obliged to have its records in sufficient order to allow the preparation of a clear and concise application package, which, in turn, will enable the inspector to complete the inspection in a timely manner. Conversely, upon receipt of a properly prepared application, ETKO has an obligation to schedule, and subsequently complete, the certification process as quickly as practical.

7.3.4. Functions

Functions of the on site inspection are performed by ETKO qualified inspectors. Because these functions constitute a major source of information used in the development of a certification profile, only those individuals with extensive experience and requisite background are entrusted to perform these functions.

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Typical profile of an ETKO Inspector is explained in GP 16 Requirements for inspector qualification and necessary trainings in SP 05 Recruitment and Training procedures:

Inspectors use the formats as outlined in ETKO quality system, for recording and reporting. Inspectors are further instructed to follow specific instructions, answer all appropriate questions and provide a final report.

7.4. Evaluation

7.4.1 Aim of the Evaluation

Upon acceptance of the application, an onsite inspection is scheduled. ETKO inspectors perform a thorough evaluation of the application, and of the applicant's capacity to produce and/or process those commodities seeking certification.

The primary purpose of this inspection is to verify the accuracy and authenticity of the submitted application material. In addition, the inspection provides a two-way exchange of information, which is valuable to both the inspector and the applicant.

The inspector and the client need to be prepared to discuss the applicant's operating practices as they have been described in the application questionnaires.

The applicant shall provide to the inspector all of the farming and/or processing facilities which are contributory to the product(s) being certified. The inspector reviews all pertinent documentation, collects specified samples, records notes and takes photographs where appropriate. Unannounced inspections should be accepted.

ETKO conducts an initial on-site inspection of each production unit, facility, and site that is included in an operation for which certification is requested.

ETKO conducts an on-site inspection annually for each certified operation to determine whether to approve the request for certification or whether the certification of the operation should continue.

7.4.2. On Site Inspection

Inspections are conducted for NOP program with this procedure. Before performing an actual on site inspection, the inspector reviews

- 1. Technical instructions;
- 2. Related OPs and GPs

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- 3. Additional specific instructions and requirements of ETKO;
- 4. Legal and statutory documents and standards.
- 5. The application file
- 6. NOP Regulation.

Initial on-site inspection is conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the production and handling requirements. Initial inspection may be delayed for up to 6 months in order to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed.

All on-site inspections are conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the production and handling requirements can be observed.

This requirement does not apply to unannounced on-site inspections.

Inspection starts with the opening meeting in which the management team of the client attends. The scope of the certification (products, processes, standards, legal requirements...) are reviewed, information about the inspection method, inspection plan and reporting is provided.

The inspection involves recording observations of the entire operation in writing and on film when applicable. During the inspection, the inspector verifies the effectiveness and compliance of the operations, effecting the certification, to the certification requirements utilizing the relevant forms and questions as per relevant documents of ETKO:

- The operation's compliance or capability to comply with the appropriate relevant regulations;
- That the information, including the organic production or handling system plan, accurately reflects the practices used or to be used by the applicant or by the certified operation; and
- That prohibited substances have not been and are not being applied to the operation through means on which ETKO has the right to collect samples of soil, water, waste, seeds, plant tissue, and plant, animal, and processed products and test them at ETKO's expense.
- The projects containing several small farm holders may have an internal control system
 operating internal check of the producers to prepare them for certification. ICS operation
 needs to be checked by the inspector according to OP 01 Inspection Procedure art. 22
 and OP 02 Grower Groups Procedure.

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For on-site inspections of farming operations, the inspector is required to walk through the applicant's operation to evaluate the farming practices. The farm applicant is required to make available to the inspector all of the farming records and facilities, which are contributory to the commodity being certified. This would include the farm itself, adjacent areas, ancillary facilities and equipment such as storage areas, tractors and other farming implements.

For on-site inspections of processing facilities, the inspector is required to evaluate the process flow as described on the applicant's flow chart. This is accomplished by observing the equipment being used, major process control points, all ingredients added to the processed product, pest control management systems, and all ingredients used in the maintenance and/or cleaning of the process equipment; and disposal of waste and other production process by-products.

The inspector will conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector addresses the need for any additional information as well as any issues of concern.

Outdated documents are withdrawn from the service after 10 years. ETKO guarantees that all valid documents are at hand to all respective users during this period.

ETKO may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the regulations...

The additional inspections may be announced or unannounced at the discretion of ETKO or as required by the AMS Administrator or State official.

7.4.3. Laboratory Testing

ETKO requires operators realize testing at a minimum is required annually. At the discretion of ETKO, additional testing may be performed by ETKO on a regular basis throughout the certification period. For the compliance of NOP regulation 205.670-672 ETKO procedures TI 05 Sampling Method and TI 40 NOP Guide Testing & Enforcement Actions are implemented.

Samples taken at the time of the initial inspection, or annual renewal, provide the initial basis for analytical enforcement. Unannounced sampling and testing may be also performed on both random surveillance bases as well as on a compliance basis.

Both routine and unannounced additional sampling and testing are at ETKO's expense when ETKO decide to make analyses.

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7.4.4. Production Inputs and Commodity Tracking System

Every certified entity, be it a grower, shipper, processor, handler or distributor, is required to collect and maintain records on all activities, materials and changes that take place within its operation. Information regarding all inputs and all physical production is required. In addition, information regarding the movement of finished product is required.

ETKO retains the option review all input and production records at any time.

The inspector must be sure that:

- the record keeping system is continuously maintained in an "auditable" format, and
- it is sufficiently comprehensive to provide all of the required information, and yet
- it is concise enough to provide unambiguous audit trail.

ETKO endeavors to utilize the applicant's established record keeping systems. All such systems must receive ETKO approval, and must be reviewed by inspector before certification may be granted.

7.4.5. Audit Report

All the observations and findings during audit are recorded on inspection reports and other related records as appropriate as required by certification process. The observations and findings in relation to the deviation from the rules, regulations are to be recorded under "Evaluation Results"

The inspectors have no authority to define a noncompliance either in inspection report or in any other record, or inform the client with such an information stating indicating a noncompliance.

At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector.

A copy of the Inspection Report and any test results are sent to the client.

Note: providing advice for corrective actions is strictly prohibited by accreditation rules.

7.4.6. Surveillance

ETKO performs periodical inspections (surveillance visits) on the client's premises/processes in order to see and verify if the products and or processes in the certification scope,

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maintains conformance to the relevant standards, statutory and legal requirements. The period for surveillance is determined during the initial inspection, if possible and included in the contract.

The scope of surveillance visits is determined during the inspection by the inspectors.

During the overall process of certification and during maintenance of the certificate, the inspector ensures that the applicant is always reminded to keep and maintain relevant records of its activities properly, in an auditable manner.

The applicant may continue to use its existing record and record keeping system, if it is found to be satisfactory by ETKO. Otherwise it is requested to improve recording and filing system.

The applicant is required to keep and maintain production input, and commodity tracking records on a continuing basis to provide as an evidence of compliance of certification requirements.

Production inputs consist of anything that is instructed to, added to, or done in the process of creating a product. Commodity tracking consists of the mechanism by which anything that moves from the certified entity's operation into the distribution chain is quantitatively followed.

All of this information must be maintained in an "auditable" form so that, should a full audit be required, information will be sufficiently presentable so as not to jeopardize the existing certification status which could result from un-audit ability of the record.

Applicants maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold as "organic", or "made with organic (specified ingredients).

7.4.7. Records:

- fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
- are maintained for not less than 5 years beyond their creation;
- must be sufficient to demonstrate compliance with the regulations
- Regular reporting of specific information, as dictated by the nature of the certified operation, is required from certified clients on an individualized basis.
- When required; at the discretion of ETKO additional testing may be performed on a regular basis throughout the certification period.

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Samples collected in the initial inspection or during surveillance provide fundamental information for the decision on certification. During the certification period sampling and testes may be done without informing the client. During the inspection, a thorough review of this record keeping system is performed to verify that they are being maintained in accordance with the terms and conditions of the program.

The record keeping requirements are fundamental to the overall certification process. For this reason, failure to maintain this necessary documentation can result in temporary suspension, or outright cancellation of certification until compliance is re-established.

If, in the judgment of ETKO, a financial audit is deemed necessary, such would be performed by an ETKO designated accounting firm under terms and conditions specified in the Certification Agreement. Every effort would be made to schedule the audit as quickly as possible, and at a time of mutual convenience, to minimize delays in proceeding with full certification.

Customer complaints records and actions taken for complaints by the client are also subject to inspection to verify that the client takes proper and effective action.

7.4.8. Continuing Support

ETKO, in providing certification, is making a commitment to support the organic integrity of its clients on an on going basis. ETKO is responsible to provide NOP Regulation and the amendments in the original language of the rule.

The changes of the certification system especially in case of changes of the certification requirements will be forwarded to the licensees.

ETKO has the right to insight the necessary documents regarding the application of new requirements.

ETKO provides relevant regulations and standards and the amendments to its clients in their language.

The clients are informed on a timely manner, about the amendments in the certification system and the changes in the certification requirements formally in written form or by publishing in website. The amendments are valid on the date as informed to the client. The client is responsible to implement the changes in the requirements as soon as received. ETKO controls the effective implementation of the changes in requirements by the client.

The clients are responsible to inform ETKO about the planned changes in their processes, on time. ETKO shall not be responsible of the results due to the late notification of the client

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about the changes. The changes in the client's system have to be inspected and approved prior to the implementation. The inspection is done on site and on the related documents

The changes to be made by the client have to be not affecting the organic status of the current production. The planned changes are strictly required to be in accordance with relevant legal requirements and standards. Otherwise, ETKO may deny the change and its consequences, and may postpone or cancel the certification of the product (ion) effected by the change.

7.4.9. Ongoing Compliance

For NOP, the ongoing compliance is enforced by a series of different check systems applied in surveillances.

Production input records

Required by the program, they shall be maintained on a current and continuous basis. These records must be available for inspection; and they also may be required as part of regular reporting requirements.

Commodity-tracking systems

They are routinely monitored in the market place by random checking. This mechanism enables ETKO to audit the flow of certified product through the channels of distribution on a real time basis.

Audits of record keeping systems

It is routinely performed during an inspection, also can be required at any time during the certification period. In addition, routine auditing of regularly reported information is performed.

Regular reporting of specific information

As dictated by the nature of the certified operation, it is required from certified clients on an individualized basis.

7.4.10. Temporary variances

Clients are allowed to receive temporary variances from the requirements in production and handling standards as established by the regulations for the following reasons:

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- Natural disaster declared by the Secretary.
- Damage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire, or other business interruption.
- Practices used for the purpose of conducting research or trials of techniques, varieties, or ingredients used in organic production or handling.

ETKO will notify USDA to recommend a temporary variance from a production or handling standard, provided that the variance is based on one or more of the reasons listed above.

ETKO will notify each applicant of the establishment of a temporary variance for each production and handling operation it certifies to which that temporary variance applies.

7.4.11. Acceptable and Prohibited Materials

The general criteria used by ETKO for determining the acceptability of a material is specified by the USDA National Organic Program's National List of Approved and Prohibited Substances.

Basic policy maintains that non-synthetically compounded materials, a group generally referred to as biological agricultural products, tend to be acceptable. Conversely, the use of synthetically compounded materials, genetically modified propagation materials, processing aids and plant protection materials, such as genetically modified parasites, predator and other organisms almost without exception, are prohibited.

In addition, those materials, which, while may not be synthetically compounded, but continue to be either highly toxic or environmentally hazardous, are similarly prohibited.

The agricultural products sold by certified clients as organic are produced and handled:

- In compliance with the National List;
- Without the use of excluded methods, except for vaccines, provided that the vaccines are approved;
- Without the use of ionizing radiation; and
- Without the use of sewage sludge.

Clients are required to verify the acceptability of inputs with ETKO prior to their use in order to avoid inadvertently jeopardizing an organic status through the use of a prohibited material.

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7.4.12. Transition Period

The setting of a fixed transitional time period may be considered arbitrary; however, benchmarks are necessary. To enter into the ETKO certification program, the minimum amount of time that an applicant's crop and cropping areas must be operated under conditions which have had no unacceptable materials applied is dictated by those regulations, which prevail over its certification.

The organic foods industry has been developing a consensus of three years as the recognized minimum acceptable period by the USDA National Legislation; NOP Regulation .

Measurement of the minimum period is determined as follows:

- Annual crops: period prior to seed planting or transplanting.
- Perennial crops: period prior to the appearance of flower buds.

7.4.13. Packaging and Post-Harvest Handling

No commodity can be considered legitimately organic unless it is organic from its field origin to the marketplace. For this reason, the importance of proper packaging and post harvest handling is equal to that of the actual field production.

7.4.14. Processing

No unacceptable materials may be used in the cleaning, packaging or storing of a certifiable product once it has been harvested. This condition applies equally regardless of whether the applicant handles all of the post harvest, or subcontracts it to another entity.

The responsible authority for these activities will be required to complete an application and affidavit regarding post-harvesting operations. Failure to properly complete this portion of the certification process could be cause for denial of certification. Special forms to complete this portion of the process are available from ETKO upon request.

7.4.15. Setting the Fee

The fee structure is generically designed to be applicable to a large number of different agricultural and processing operations. However, because these operations are so diverse, it is virtually impossible to structure a schedule, which anticipates every variation.

Therefore, prior to the acceptance of an application, ETKO will determine what, if any, additional changes will be required to the basic fee structure. These changes will be

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presented, in detail, to the applicant who will have the opportunity to approve the changes, modify the application, or withdraw it entirely.

The applicant's decision is then formalized in writing and incorporated as part of the Certification Agreement, which is included with the transmittal accepting the application.

7.4.16 Propagation Material Non-commercially Available

Operators or producers certified by ETKO must apply with the "Propagation Material Approval Form" to ETKO for approval of a non-commercially available organic propagation material before use in organic production.

Applicant should prove that there is no source available by documents. ETKO checks possible sources which can provide the propagation material through National List from the statistics of the origin country Ministry of Agriculture.

ETKO Certified operations and producers are obliged to follow the NOP Regulation 205.204 Seeds and Planting Stocks Practice Standard and ETKO procedures mentioned on 5.17 of this procedure.

7.4.17 Ingredients Non-commercially Available

ETKO Certified operations and producers are obliged to follow the NOP Regulation 205.105 "Allowed and prohibited substances, methods, and ingredients in organic production and handling",

205.270 Organic Handling Requirements,

205.301 Product Composition,

205.606 Non-organically produced agricultural products allowed as ingredients in or on processed products labeled as organic or made with organic ingredients.

7.5. Granting Certification

7.5.1. Certification Decision

The Organic Certifier is responsible for all the decisions in relation to certification (granting, suspension, revoking...) The OC is independent of the application review and or certification process.

Granting the certificate depends on the appropriate planning or, planning and implementation of the corrective actions in a timely manner for the Notification of

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Noncompliance "GP 18 F 10" reported by the OC to client, based on the inspection reports and all other supporting documents and evidences.

Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by ETKO or the State organic program's governing State official, or the Administrator.

ETKO Organic Certifier grants certification based on the determination that:

- The applicant is in compliance with its organic system plan and all procedures;
- The activities of the applicant's operation are in compliance with the appropriate regulations; and
- The applicant is able to conduct operations in accordance with the plan

7.5.2. Certification Certificate

Within a reasonable time after completion of the initial on-site inspection, the Organic Certifier (OC) reviews the on-site inspection report, the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant. If the organic system plan and all procedures and activities of the applicant's operation are in compliance with the certification requirements and that the applicant is able to conduct operations in accordance with the plan, the OC grants certification. (GP 13 F 03 NOP certificate)

The certification may include requirements for the correction of minor non compliances within a specified time period as a condition of continued certification. (See art.5.24)

The certificate of organic operation specifies the:

- (1) Name and address of the certified operation; including a physical address if the mailing or legal address is not the physical location of the operation
- (2) Name, address, and telephone number of ETKO
- (3) Effective date of certification; (when ETKO or initial certifying agent first certified the operation to the USDA organic regulations)
- (4) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation;
- (5) Issue date (when ETKO issued the organic certificate);
- (6) Anniversary date (when the certified operation must submit its annual update). Organic certificates cannot include expiration dates;
- (7) Categories of organic operation (crops, wild crops, livestock, and handling / processing)

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Once certified, a production or handling operation's organic certification continues in effect until surrendered by the client or suspended or revoked by ETKO or the Administrator.

A list of all issued certificates shall be maintained, containing the following information:

- Certificate number
- Client/company name
- Address-country
- Applicable standards, regulations
- Scope of certification
- Accreditation status
- Certification date
- Validity date
- Status of certification (suspended, withdrawn...)

7.5.3. Denial of Certification

ETKO provides a Notification of Noncompliance (NONC) (GP 18 F10) to the applicant when ETKO has reason to believe that the applicant for certification is not able to comply or is not in compliance with the requirements

- during the application review, based on a review of the information submitted by the applicant (as specified in NOP rule §205.402) or
- during the initial inspection (as specified in NOP rule §205.404)

When correction of a noncompliance is not possible, a Notification of Noncompliance and a Notification of Denial of Certification may be combined in one notification. The Notification of Noncompliance (NONC) (GP 18 F 10) provides:

- 1. A description of each noncompliance;
- 2. The facts upon which the Notification of Noncompliance (NONC) GP 18 F 10 is based; and
- 3. The date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

Upon receipt of such notification of noncompliance, the applicant may:

1. Correct noncompliance and submit a description of the corrective actions taken with supporting documentation to ETKO; or

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- 2. Correct noncompliance and submit a new application to another certifying agent. (NOTE: If such an applicant applies to ETKO for certification, the applicant must include a complete application, the notification of noncompliance received from the first certifying agent, and a description of the corrective actions taken with supporting documentation) or
- 3. Submit written information to ETKO to rebut the noncompliance described in the notification of noncompliance.

After issuance of a Notification of Noncompliance (GP 18 F 10), ETKO:

- 1. Evaluates the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and
 - When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issues the NOP Certificate (GP 13 F 03) to the applicant pursuant to §205.404; or
 - When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issues the applicant a Notification of Denial of Certification (NODC) "GP 18 F 12A or GP 18 F 12B"
- 2. If applicant fails to respond to the Notification of Noncompliance (GP 18 F10), issues a Notification of Denial of Certification.(NODC) (GP 18 F 12 A in application review phase, GP 18 F 12 B in initial inspection phase)

Copies of NONC, NODC, NONCR are submitted to the Administrator, pursuant to §205.501(a)(15).

The Notification of Denial of Certification (NODC) (GP 18 F 12 A&B) states the reason(s) for denial and the applicant's right to:

- Reapply for certification
- Request mediation to Administrator or, if applicable, pursuant to a State organic program; or
- File an appeal of the denial of certification pursuant to §205.681 or, if applicable, pursuant to a State organic program.

The applicant for certification who has received the NONC (GP 18 F 10) or the Notification of Denial of Certification NODC (GP 18 F 12 A or B) may apply for certification again at any time to any certifying agent, in accordance with §§205.401 and 205.405(e).

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When such applicant submits an application to ETKO instead of the certifying agent who issued the notification of noncompliance or notice of denial of certification, the applicant for certification must include a copy of the Notification of Noncompliance "NONC" or Notice of Denial of Certification "NODC" and a description of the actions taken, with supporting documentation, to correct the noncompliance noted in the notification of noncompliance.

When ETKO receives a new application for certification, which includes a notification of noncompliance or a notice of denial of certification issued by another CB, the application is treated as a new application and a new application process is started pursuant to §205.402.

• False statements or mis-presentations

If ETKO has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented its operation or its compliance with the certification requirements, the certification may be denied certification without first issuing a Notification of Noncompliance (GP 18 F10)

7.5.4. Continuation of Certification.

Each year, before the date indicated by ETKO, the producer must notify ETKO of its schedule of production of crop products, giving a breakdown by parcel. This schedule can be shown on the organic compliance plan. Plan needs to be revised each year by the operator and review will be made by a competent staff of ETKO. The operators that do not annually submit the information required as follows will be issued Notification of Non compliance.

To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to ETKO:

- 1. An updated organic production or handling system plan which includes:
 - a. A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year; and
 - b. Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, related to production practices
- 2. Any additions to or deletions from the information related to address, responsible person, name of the company, telephone number_given to ETKO for certification.
- 3. An update on the correction of minor noncompliance previously identified by ETKO as requiring correction for continued certification; and

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4. Other information as deemed necessary by ETKO to determine compliance with the Act and the regulations in this part.

Following the receipt of the a/m information, ETKO, within a reasonable time arranges and conducts an on-site inspection of the certified operation as per OP 01 (pursuant to §205.403) Note: When it is impossible to conduct the annual on-site inspection following receipt of the client's annual update of information, ETKO may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months: *Provided*, That, the annual on-site inspection is conducted within the first 6 months following the client's scheduled date of annual update.

If ETKO has reason to believe, based on the on-site inspection and a review of the information specified by client, that the client is not complying with the requirements of the Act and the regulations in this part, then ETKO <u>Organic Certifier</u> provides the Notification of Noncompliance (GP 18 F 10) to the operation in accordance.

In case ETKO determines that the client is complying with the Act and the regulations and that any of the information specified on the certificate of organic operation has changed, then, an updated certificate of organic operation is provided.

In case annual update is not provided before the annual inspection a written notification of noncompliance (GP 18 F 10) is provided to client by the OC.

7.5.6. Conditional Certification

When a product is qualified as being organic, but deficiencies in its producing operation remains, conditional certification may yet be granted. The applicant is notified of the non compliances determined by ETKO, which are necessary to be remedied within a specified timeframe. Upon the applicant's corrective action plans for the non compliances, certification can be conditionally granted – with a concurrent verification of actions taken for compliance.

Exempt handlers

Operations that are exempt from certification and submission of an organic system plan are subject to the following requirements:

• Any production or handling operation with gross agricultural income from organic sales that total less than \$5,000.00 annually.

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- A handling operation that is a retail food establishment or portion of retail food establishment that handles but does not process organically produced agricultural products.
- A handling operation or portion of handling operation that handles agricultural products that contain less than 70 percent organic ingredients (by total weight of the finished product, excluding water and salt).
- A handling operation or portion of handling operation that only identifies organic ingredients on the information panel.

Exempt handlers who only handle products containing less than 70 percent organic ingredients or only list organic ingredients on the information panel must comply with the following:

- Provisions for the prevention of organic products commingled with non-organic and prevention of contact with prohibited substances;
- Labeling provisions; and
- Recordkeeping provisions in §205.101 (c)

Products from an exempt production operation cannot be used as ingredients identified as organic in processed products produced by a certified handling operation

The following operations are excluded from the NOP regulatory requirements

- A handling operation or portion of a handling operation and the operation or portion
 of the operation only sells organic agricultural products labeled as "organic" provided
 such products are packaged or otherwise enclosed in a container prior to being
 received or acquired by the operation; and remain in the same package or container
 and are not otherwise processed while in the control of the handling operation.
- A retail food establishment or portion of a retail food establishment that processes, on the premises of the retail food establishment, raw and ready-to-eat food from agricultural products that were previously labeled as "organic."

Excluded handling operations shall comply with the requirements to prevent commingling and contact with prohibited substances and the requirements for labeling in §205.310

Exempt handling operations, as identified by §205.101(a) (3-4), shall maintain for 3 years records sufficient to:

- Prove that ingredients identified as organic were organically grown, and
- Verify quantities produced from organic ingredients

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Records shall be available to representatives of the Secretary and State officials.

7.5.7. Compliance and Handling of Noncompliance

ETKO will handle noncompliance's according to:

- NOP 4002 Instruction Enforcement of the USDA Organic Regulations Penalty Matrix and
- NOP Instruction 2612 Recommended Penalties for Violations of Specific Regulatory Requirements and NOP 2612-1 Penalty Matrix for violations of the USDA Organic Regulations

NOP 4002 provides instructions for taking enforcement action against certified operations that violate the U.S. Department of Agriculture (USDA) organic regulations.

NOP 2612-1 Penalty Matrix for violations of the USDA Organic Regulations, provides guidance about recommended penalties for violation classes and categories.

7.5.8. Review and Investigations

NOP Program Manager, on behalf of the Secretary, may inspect and review certified production and handling operations and accredited certifying agents for compliance with the Act or regulations.

The Program Manager may initiate suspension or revocation proceedings against a certified operation when the Program Manager has reason to believe that a certified operation has violated or is not in compliance with the Act or regulations or when a certifying agent or a State organic program's governing State official fails to take appropriate action to enforce the Act or regulations.

ETKO may investigate complaints of noncompliance with the Act or regulations concerning production and handling operations certified as organic. Program Manager is informed of all compliance proceedings and actions taken.

A State organic program's governing State official may investigate complaints of noncompliance with the Act or regulations, concerning organic production or handling operations operating in the State.

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7.5.9. Noncompliance

ETKO provides the Notification of Noncompliance (NONC) (GP 18 F 10) to the applicant/certified operation in cases where and when:

- ETKO has reason to believe that, based on the information specified in application
 package DURING APPLICATION PACKAGE REVIEW, the applicant for certification is not
 able to comply or is not in compliance with the requirements of NOP rule. and
- ETKO has reason to believe that, BASED ON THE ON-SITE INSPECTION and the results of
 any analyses for substances conducted, and any additional information requested from
 or supplied by the applicant, the organic system plan and all procedures and activities of
 the applicant's operation, a certified operation is not complying with the requirements of
 NOP.

All the observations made during initial inspection, surveillance and special inspections are recorded on the Inspection Report Section Evaluation Results

The inspectors have no authority to define a noncompliance either in inspection report or in any other record, or inform the client with such an information stating indicating a noncompliance.

<u>The Organic Certifier</u> provides the Notification of Noncompliance (GP 18 F 10) to the client, upon the evaluation of the application file or inspection reports and all other related documents and information obtained during inspection.

While grading non-conformances the following conditions shall be considered:

- One of the requirements of standard or regulation related to the process or product are not complied
- Production process plan not applied
- Product is under risk

Non-conformances are graded as major and minor.

Major non-conformances

- o Factors affecting the organic integrity of the product or land.
- o Factors causing risk on the product.
- o Use of inputs which are not allowed by the regulations.
- Non-Organic product sales as organic.
- o Requirements of regulation or standard not applied

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- o Frequent minor non-conformances on the same requirement of regulation.
- o Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- o Misuse of the licenses and certificates
- o Production process plan not implemented.
- o Annual updates not provided
- Several minor interrelated noncompliance can lead to a major noncompliance.

Minor non-conformances

- Failure to fully satisfy a requirement of a standard or regulation.
- Factors causing no risk on the condition of the product.

Notification of noncompliance (GP 18 F 10) clearly indicates

- A description of the noncompliance,
- The facts upon which the notification of noncompliance is based; and
- The date by which the applicant/certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

By a Notification of Noncompliance (GP 18 F 10), ETKO requires the certified operation to determine corrective action plan(s) related to the major and minor non-compliances defined in the Notification of Noncompliance.

- To be recommended for certification all major non-conformances must be closed and corrective action plans for minor non-conformances must be determined by the client
- Non-conformances graded as Major in Notification of Noncompliance: corrective actions
 must be taken in maximum 30 days. To close out the major non-conformances a follow
 up inspection may be decided by ETKO.
- Non-conformances graded as **Minor** in Notification of Noncompliance: action plans within 30 must be provided to ETKO by the client.

Corrective action plans and or any other evidence indicating the actions taken are submitted to ETKO to be reviewed by Organic Certifier.

7.5.9.1. Resolving the Non-Compliances

Upon receipt of Notification of Noncompliance, the client may:

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- Correct the non-compliances and submit a description of the corrective actions taken with supporting documentation to ETKO;
- 2. Submit written information to ETKO to rebut the noncompliance, described in the Notification of Noncompliance (GP 18 F 10)

After sending a Notification of Noncompliance (GP 18 F 10), ETKO evaluates the client's corrective actions and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary.

7.5.9.1.1. Resolution of Noncompliance: When a client demonstrates that each noncompliance has been resolved, the OC sends to client a Notification of Noncompliance Resolution (GP 18 F 11)

7.5.9.1.2. Proposed suspension or revocation: When rebuttal is unsuccessful or correction of the noncompliance is not completed within 30 days, ETKO will send the certified operation a written notification of proposed suspension (GP 18 F 13) or revocation (GP 18 F 15) of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

After receipt of the Notification of Proposed Suspension or Revocation the certified operator may:

- 1. File an appeal to this Proposed Suspension or Revocation in 30 calendar days of the receipt of the notice. The appeal must be in writing and submitted to ETKO Managing Director and to the Administrator.
- 2. Request mediation within 30 days of this notice, in writing to ETKO. If the request for mediation is accepted and the mediation is unsuccessful, upon written notification, the certified operator then will have 30 calendar days, from receipt of notice, to appeal the Proposed Suspension or Revocation. If the request for mediation is rejected, a written notification is sent to the operator and in 30 days from the date of the notice, the operator may appeal the Proposed Suspension or Revocation.

When correction of a noncompliance is not possible, the Notification of Noncompliance and the Proposed Suspension or Revocation of certification may be combined in one notification. The Notification of Proposed Suspension or Revocation of certification states:

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

7.5.9.1.3. Suspension or revocation:

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- (1) If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, ETKO will send the certified operation a written notification of suspension (GP 18 F 14) or revocation (GP 18 F 16)
- (2) ETKO will not send a notification of suspension or revocation to a certified operation that has requested mediation pursuant to §205.663 or filed an appeal pursuant to §205.681, while final resolution of either is pending.

In case of suspension, the certified operation is no longer certified and must go through the reinstatement process. Therefore certified operation is not able to sell, label, and represent the product as organic for the suspension period. Once suspended, reinstatement for certification may only be requested from the Administrator and will only be considered for certification if the Notification of Noncompliance (GP 18 F 10) is corrected and the operation has been inspected by ETKO to verify that the operation complies with the requirements.

7.5.10. Willful violations

 If there is reason to believe that a certified operation has willfully violated the Act or regulations, ETKO sends the certified operation a Notification of Proposed Suspension or Revocation GP 18 F 13 or GP 18 F 15 of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

7.5.11. Violations of Act.

In addition to suspension or revocation, any certified operation that:

- knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in §3.91(b)(1) of this title" per violation.
- 2. makes a false statement under the Act to the Secretary, a State organic program's governing State official, or a certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

7.5.12. Eligibility.

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

2-A certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years

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following the date of such revocation, *Except*, That, the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

7.5.13. Reinstatement of the Suspended Certificate

7.5.13.1 Requirements for Suspended organic producers or handlers

In order to achieve reinstatement, organic producers and handlers who have had their organic certification suspended must:

- 1. Correct all noncompliances to the USDA organic regulations. This includes not only the reasons stated in the notice of suspension issued by ETKO, but any outstanding noncompliance's that have been subsequently identified ETKO.
- 2. Ensure that their organic systems plan (OSP) is complete, that the OSP is in compliance with the USDA organic regulations, and that the OSP is being implemented.
- 3. Contact ETKO and submit all documents required by ETKO for reinstatement. If the suspension has been issued by a CB other than ETKO, the producer or handler must inform ETKO of their suspended status and the reasons for the suspension.
- 4. Pay all fees required by ETKO
- 5. Successfully complete a full onsite inspection. The inspection should be conducted pursuant to § 403 (a)(1) and this procedure.
- 6. Prepare a letter (GP 18 F 17 Reinstatement Request Letter from Suspended Operation to USDA) addressed to the Secretary of Agriculture, care of the NOP, requesting reinstatement of certification. The operator sends the letter to:

USDA, AMS, National Organic Program 1400 Independence Avenue, SW Room 2648, STOP 0268 Washington, DC 20250 Or, AIAInBox@ams.usda.gov

Shipping services that require a telephone number may use (202) 720-3252. As an alternative, producers or handlers who have had their organic certification suspended may submit the letter addressed to the Secretary, care of the NOP, through ETKO. ETKO forwards the request to the NOP, along with the required reinstatement documents described in section 5.26.2

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7. Retain all documents related to the request for reinstatement for future audit by the certifying agent and the NOP.

7.5.13.2 Requirements for ETKO

It is ETKO's responsibility to officially inform the suspended producer or handler about the requirements stated in 5.26.1. ETKO communicates with the suspended producer or handler and send an official letter providing the operator with all the information required by the operator to apply to USDA for reinstatement.

Upon receipt of the operation's request for reinstatement or notification that such a request has been sent to NOP, ETKO:

- 1. Conducts a compliance review of the OSP to ensure that all provisions of the USDA organic regulations are met.
- 2. Notify the producer or handler who has had their organic certification suspended of any noncompliances according to procedures described in the USDA organic regulations, §205.662(a) and in this procedure by sending NONC letter.
- 3. Schedules a full onsite inspection to verify the operation's compliance with the USDA organic regulations, provided that the OSP is considered to be complete and in compliance with the USDA organic regulations. On site inspections is done within a three month period prior to the NOP receiving the reinstatement request. Deviations from this procedure must be justified and approved by the NOP.
- 4. Prepare a signed letter (GP 18 F 18 ETKO Reinstatement Request Letter for Suspended Operation to USDA) to the Secretary, care of the NOP, stating that the operation requesting reinstatement has met all requirements of the USDA organic regulations. The letter affirmatively states that:
 - a. ETKO has conducted an NOP compliance review of the client's OSP.
 - b. The review found that the client's OSP adequately addressed the noncompliance(s) which led to the suspension and is in compliance with the USDA organic regulations.
 - c. ETKO has conducted an onsite inspection of operation and found the operation to be in full compliance and capable of remaining in compliance with the USDA organic regulations, or, noncompliance were issued to the operation as a result of the onsite inspection findings and the operation has submitted corrective

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measures that are approved and determined by the certifying agent to demonstrate compliance with the USDA organic regulations.

- 5. Submits the letter (along with the operation's request for reinstatement, if appropriate), as well as the initial Notice of Noncompliance, Notice of Proposed Suspension, Notice of Suspension, and a copy of the inspection report that found the operation in full compliance. If the inspection report includes findings that may be noncompliant, then ETKO's request for reinstatement includes documented objective evidence to demonstrate the operation's full compliance with the USDA organic regulations.
- 6. Retains all documents related to the request for reinstatement for future audit by the NOP.

7.5.13.3. National Organic Program

Upon receipt of the required documentation, the NOP Accreditation and International Activities Division completes the following steps within 30 days of receipt of the request for reinstatement:

- 1. Review the request for reinstatement along with the supporting documentation. Contact the certifying agent if questions remain regarding the request.
- 2. Approve the request if:
 - All required documents have been submitted,
 - The documentation clearly demonstrates that the operation is in compliance with the USDA organic regulations and is capable of remaining in compliance, and;
 - The review of documents related to the operation does not indicate that the client has an ongoing history of noncompliance which would indicate an inability or unwillingness to remain in compliance.
- 3. If the request is approved, the NOP removes the operation from the public list of suspended operations. The NOP issues a letter to the operation, with a copy to ETKO, stating that:
 - a. The operation is eligible for reinstatement by the certifying agent referenced in the request, and
 - b. ETKO retains all documents related to the reinstatement for future audit by the NOP.

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4. If the request is denied, issues a letter to the operation, with a copy to ETKO, stating the reasons for denying reinstatement.

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5. Review all documentation related to the reinstatement at ETKO's next onsite audit.

7.5.14. Adverse Action Appeal Process

Appeals to be implemented according to the procedure "NOP 4011 Agricultural Marketing Service Office of the Administrator Adverse Action Appeal Process for the National Organic Program" which

- 1) explains the adverse action appeal process;
- 2) clarifies the roles and responsibilities of those involved in the adverse action appeal process; and
- 3) describes possible appeal outcomes

To proceed for an appeal:

7.5.14.1. Objections, Complaints and Legal Cases

Licensee is requested to prepare a file to handle the objections, complaints, and legal cases from its own clients.

This file includes:

- The nature of the received objections, complaints, and legal cases
- The identity of the involved persons/groups
- The causes of the problem
- The action taken
- verification and documentation of the effectiveness of the initiated measures

A specific file is maintained for handling of objections, complaints, and legal cases which at least includes followings:

- Records of the received objections, complaints, and legal cases
- Names of the involved persons/groups
- Records of the subsequently action chosen
- Verification and documentation of the effectiveness of the measures taken

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An applicant may appeal ETKO's Notification of Denial of Certification (NODC), and a certified operation may appeal ETKO's Notification of Proposed Suspension (NOPS) or revocation of certification (NOPR), to the AMS Administrator.

Exception: When the applicant or ETKO is subject to an approved State organic program, the appeal must be made to the State organic program which will carry out the appeal pursuant to the State organic program's appeal procedures approved by the Secretary.

If the Administrator or State organic program sustains a certification applicant's or certified operation's appeal of ETKO's decision, the applicant will be issued organic certification, or a certified operation will continue its certification, as applicable to the operation. The act of sustaining the appeal shall not be an adverse action subject to appeal by ETKO.

If the AMS Administrator or State organic program denies an appeal, a formal administrative proceeding will be initiated to deny, suspend, or revoke the certification. Such proceeding shall be conducted pursuant to the U.S. Department of Agriculture's Uniform Rules of Practice or the State organic program's rules of procedure.

7.5.14.2. Filing

An appeal of a noncompliance decision is filed within the time period provided in the letter of notification or within 30 days from receipt of the notification, whichever occurs later. The appeal will be considered "filed" on the date received by the AMS Administrator or by the State organic program. A decision to deny, suspends, or revoke certification or accreditation will become final and no appealable unless the decision is appealed in a timely manner.

Appeals to the AMS Administrator is filed in writing and addressed to Administrator, USDA-AMS, Room 2095-S, and 1400 Independence Ave, SW, Washington, DC 20250.

Appeals to the State organic program are filed in writing to the address and person identified in the letter of notification.

All appeals shall include a copy of the adverse decision and a statement of the appellant's reasons for believing that the decision was not proper or made in accordance with applicable program regulations, policies, or procedures.

7.5.15. Mediation.

Any dispute with respect to denial of certification or proposed suspension or revocation of certification may be mediated at the request of the applicant for certification or client.

Mediation shall be requested in writing to ETKO.

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If ETKO rejects the request for mediation, a written notification is provided to the applicant for certification or client. The written notification shall advise the applicant for certification or client of the right to request an appeal within 30 days of the date of the written notification of rejection of the request for mediation.

If mediation is accepted by ETKO, a qualified mediator mutually agreed upon by the parties to the mediation shall conduct such mediation. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session. If mediation is unsuccessful, the applicant for certification or client shall have 30 days from termination of mediation to appeal the ETKO's decision.

Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and NOP regulations. The Secretary may review any mediated agreement for conformity to the Act and NOP regulations and may reject any agreement or provision not in conformance with the Act or NOP regulations.

7.5.16. Use Of Logo, Licenses, Mark Of Conformity
See procedure GP 11 Use Of Logo, Licenses, Mark Of Conformity

7.5.17. Criteria for Certification File Review

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DEFECTS	DEFECT CODE	DECISION
GROUP A- CERTIFICATION RECOMMENDATION		
Company/Client name is clearly recorded	A2	NO GO
The licensee number is recorded	A3	NO GO
The address of client/site is recorded	A4	NO GO
Type of certification is specified	A5	NO GO
The related standards and regulations are clearly specified	A6	NO GO
The scope is clearly recorded	A7	NO GO
GROUP B		
The info provided about identity and regulations are correct	B2	NO GO
Inspection dates	В3	PREPARE
Inspection type is specified	B4	NG
Scope is specified clearly	B5	NG
Inspected sites are specified	B6	NG
Findings and observations	B8	NG
GROUP BB		
The info related to the client matches	BB1	NG
Approval of HI	BB2	NG
Signature of the inspector.	BB3	NG
Stamp applied	BB4	NG
GROUP C – INSP. REPORT		
Ensure information duly recorded	C1	NG
Ensure info for change of scope is provided for agricultural units,	C2	NG
processes, product as appropriate		
Info about field and yield	C3	NG
Info about marketing results	C4	Р
Sampling info	C5	Р
Ensure inspection findings are summarized with inspection report	C6	NG
Ensure applicable forms are checked and used	C8	NG

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Name of licensee/company		
Licensee no	Date application	
Name of product(s)		
Form Prepared by		

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

APPLICANT SECTION

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

SUBPART D Labels, Labeling, and Market Information

§205.301 Product composition.

- (a) Products sold, labeled, or represented as "100 percent organic." A raw or processed agricultural product sold, labeled, or represented as "100 percent organic" must contain (by weight or fluid volume, excluding water and salt) 100 percent organically produced ingredients. If labeled as organically produced, such product must be labeled pursuant to §205.303.
- **(b) Products sold, labeled, or represented as "organic."** A raw or processed agricultural product sold, labeled, or represented as "organic" must contain (by weight or fluid volume, excluding water and salt) not less than 95 percent organically produced raw or processed agricultural products. Any remaining product ingredients must be organically produced, unless not commercially available in organic form, or must be nonagricultural substances or non-organically produced agricultural products produced consistent with the National List in subpart G of this part. If labeled as organically produced, such product must be labeled pursuant to §205.303.
- (c) Products sold, labeled, or represented as "made with organic (specified ingredients or food group(s))." Multi-ingredient agricultural product sold, labeled, or represented as "made with organic (specified ingredients or food group(s))" must contain (by weight or fluid volume, excluding water and salt) at least 70 percent organically produced ingredients which are produced and handled pursuant to requirements in subpart C of this part. No ingredients may be produced using prohibited practices specified in paragraphs (f)(1), (2), and (3) of §205.301. Nonorganic ingredients may be produced without regard to paragraphs (f)(4), (5), (6), and (7) of §205.301. If labeled as containing organically produced ingredients or food groups, such product must be labeled pursuant to §205.304.
- (d) Products with less than 70 percent organically produced ingredients. The organic ingredients in multi-ingredient agricultural product containing less than 70 percent organically produced ingredients (by weight or fluid volume, excluding water and salt) must be produced and handled pursuant to requirements in subpart C of this part. The nonorganic ingredients may be produced and handled without regard to the requirements of this part. Multi-ingredient agricultural product containing less than 70 percent organically produced ingredients may represent the organic nature of the product only as provided in §205.305.



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Applicant Section & ETKO Verification

	Applicant Section	ETKO Verification
§205.303 Packaged products labeled "100 percent organic" or	YES NA	YES No NA
"organic."	7	
(a) Agricultural products in packages described in §205.301(a) and (b) may display, on		
the principal display panel, information panel, and any other panel of the package and		
on any labeling or market information concerning the product, the following:		
(1) The term, "100 percent organic" or "organic," as applicable, to modify the name of		
the product;		
(2) For products labeled "organic," the percentage of organic ingredients in the		
product; (The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear		
in its entirety in the same type size, style, and color without highlighting.)		
(3) The term, "organic," to identify the organic ingredients in multi-ingredient products		
labeled "100 percent organic";		
(4) The USDA seal; and/or		
(5) The seal, logo, or other identifying mark of the certifying agent which certified the		
production or handling operation producing the finished product and any other		
certifying agent which certified production or handling operations producing raw		
organic product or organic ingredients used in the finished product: Provided, That, the		
handler producing the finished product maintain records, pursuant to this part,		
verifying organic certification of the operations producing such ingredients, and:		
Provided further, That, such seals or marks are not individually displayed more prominently than the USDA seal		
(b) Agricultural products in packages described in §205.301(a) and (b) must		
(1) For products labeled "organic," identify each organic ingredient in the ingredient		
statement with the word, "organic," or with an asterisk or other reference mark which		
is defined below the ingredient statement to indicate the ingredient is organically		
produced. Water or salt included as ingredients cannot be identified as organic.		31
(2) On the information panel, below the information identifying the handler or		
distributor of the product and preceded by the statement, "Certified organic by * * *,"		
or similar phrase, identify the name of the certifying agent that certified the handler of		
the finished product and may display the business address, Internet address, or		
telephone number of the certifying agent in such label.		
§205.304 Packaged products labeled "made with organic (specified	YES NA	YES No NA
ingredients or food group(s))."		
(a) Agricultural products in packages described in §205.301(c) may display on the	1	
principal display panel, information panel, and any other panel and on any labeling or		
market information concerning the product:		
(1) The statement:		¥
(i) "Made with organic (specified ingredients)": Provided, That, the statement does not		
list more than three organically produced ingredients; or (ii) "Made with organic (specified food groups)": Provided, That, the statement does		
not list more than three of the following food groups: beans, fish, fruits, grains, herbs,		
meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk		
products; and, Provided further, That, all ingredients of each listed food group in the		
product must be organically produced; and		
(iii) Which appears in letters that do not exceed one-half the size of the largest type		
size on the panel and which appears in its entirety in the same type size, style, and		
color without highlighting.		all and a
(2) The percentage of organic ingredients in the product. The size of the percentage		
statement must not exceed one-half the size of the largest type size on the panel on		
which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.		
(3) The seal, logo, or other identifying mark of the certifying agent that certified the		
handler of the finished product.		
(b) Agricultural products in packages described in §205.301(c) must:		
(1) In the ingredient statement, identify each organic ingredient with the word,		1
"organic," or with an asterisk or other reference mark which is defined below the		
ingredient statement to indicate the ingredient is organically produced. Water or salt		
included as ingredients cannot be identified as organic.		
(2) On the information panel, below the information identifying the handler or		
distributor of the product and preceded by the statement, "Certified organic by * * *,"		
or similar phrase, identify the name of the certifying agent that certified the handler of	1	
the finished product: Except, That, the business address, Internet address, or telephone		Al .



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(c) Agricultural products with less than 70 percent organically produced ingredients and produced ingredients and produced ingredients was only identify the organic content of the products of the finished product with less than 70 percent organically produced ingredients and produced ingredients and produced ingredient in the ingredient statement with the word, organically produced ingredient in the ingredient statement with the word, organically produced ingredient in the ingredient statement with the word, organically produced ingredient in the ingredient statement with the word, organically produced ingredient are identified in the ingredient statement, displaying the products with less than 70 percent organically produced ingredients are identified in the ingredient statement, displaying the products with less than 70 percent organically produced ingredients are identified in the ingredient statement, displaying the products with less than 70 percent organically produced ingredients are identified in the ingredient statement, displaying the product with the statement organically produced ingredients are identified in the ingredient statement, displaying the product with the statement organically produced ingredients or the ingredients or the ingredients organic contribution of the statement of the statement of the statement organically produced ingredients and statement or production or handling operation producing the statement or production or handling operation producing the raw or processed organic ingredients. (a) The word, organic, or an attests or organic and produced. Water or salt included as ingredients cannot be identified as organic ingredients and the identified as organic ingredients. (b) Devotock feed products described in \$205.01(e)(1) and (e)(2) must. (c) On the information panel, below the information describing the handler or distributor of the product and preceded by the statement, "Certified organic by """" or similar phrase, slipsy the name of the certifying agent which certified or	number of the certifying agent may be included in such label.		4/2
\$205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients (a) ha agricultural product with less than 70 percent organically produced ingredients may only identify the organic content of the product by (1) dentifying each organically produced ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement, displaying the product by the ingredient statement, displaying the product percentage of organic content on the information panel. (2) If the organically produced ingredients are identified in the ingredient statement, displaying the product percentage of organic content on the information panel. (10) Agricultural products with less than 70 percent organically produced ingredients must not designate. (11) The USDA seal; and (2) Any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients. **205.306 Labeling of livestock feed.** (a) Livestock feed products described in \$205.301(e)(1) and (e)(2) may display on any package panel the following terms: (1) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feel product. (2) The USDA seal; (3) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feel product. (2) The USDA seal; (3) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feel product. (4) The USDA seal; (3) The seal, logo, or other identifying mark of the certifying agent which certified the product on rhandling operation producing the raw or processed organic ingredients under the product and preceded by the statement, "Certified organic hygonic product in the fellowing terms or similar phrase, display the name of the feel product. (a) The view of the product and preceded by the statement, "Certified organic by " " " " " or similar phrase, display the result of the	(c) Agricultural products in packages described in §205.301(c) must not display the		
percent organically produced ingredients. (a) An agricultural product with less than 70 percent organically produced ingredients may only identify the organic content of the product by. (1) identifying each organically produced ingredient in the ingredient statement with word, "organic," or with an stereots or other reference mark which is defined below the word, "organic," or with an stereots or other reference mark which is defined below. (2) If the organically produced ingredients are identified in the ingredient statement, displaying the product's percentage of organic contents on the information panel. (a) Agricultural products with fess than 70 percent organically produced ingredients must not display. (1) The USDA seals and (2) Any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients. 5205.306 Labelling of livestock feed. (2) I The USDA seals and (3) The seal, logo, or other identifying mark of the certifying agent which certified the product of the feed product. (3) The seal, logo, or other identifying mark of the certifying agent which certified the production or handling operation producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients producing the raw or processed organic ingredients produced to intentifying the handler or distributor of the product and preceded by the statement, "Certified organic by * * *, or similar phrase, display the name of the certifying agent that certified the handler or distributor of the product and preceded by the statement, "Certified organic by * * *, or similar phrase, display the name of the certifying agent that certified the handler or other institutor of the product and preceded by t			
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package to identify ingredients that are organically produced. Water or salt included as ingredients cannot be identified as organic. (i) Divestock feed products described in \$205.301(e)(1) and (e)(2) must: (i) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by * * *," or similar phrase, display the name of the certifying agent that certified the handler of the finished product. The business address, internet address, or telephone number of the certifying agent may be included in such label. (2) Comply with other Federal agency or State feed labeling requirements as applicable. \$205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks: (1) The name and contact information of the certifying agent which certified the handler which assembled the final product; (2) Identification of the product as organic; (3) Special handling instructions needed to maintain the organic integrity of the product; (4) The USDA seal; (5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product. (b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable. (c) Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping containers and shipping documents accompanying such organic products are clearly marked "for Export Only" and: Provided fu		A	
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A Company of the contract of t	an three organic ingredients or food groups,		
and			4
	gredient statement, the organic ingredients		
are identified as "organic."			¥
	agricultural products labeled as "made with		7
	up(s))" in retail displays, display containers,		
and market information may display the	certifying agent's seal, logo, or other		
identifying mark.		v==	
§205.310 Agricultural products pro	duced on an exempt or excluded	YES NA	YES No NA
operation.			
The state of the s	oduced or handled on an exempt or excluded		
operation must not:	a annutic and an other identifician made which		4
represents the exempt or excluded opera	g agent's seal or other identifying mark which		
	product or certified organic ingredient to any		1
buyer.	broduct of certified organic ingredient to any		
	oduced or handled on an exempt or excluded	,	
	product or organic ingredient in a multi-		
	npt or excluded operation. Such product or		
	esented as "organic" in a product processed by		
others.	and the state of t		
(c) Such product is subject to requiremen	ts specified in paragraph (a) of §205.300, and	1	
paragraphs (f)(1) through (f)(7) of §205.3	01.		
§205.311 USDA Seal.		YES NA	YES No NA
(a) The USDA seal described in paragraph	s (b) and (c) of this section may be used only		
for raw or processed agricultural product	s described in paragraphs (a), (b), (e)(1), and		
(e)(2) of §205.301.	The second secon		
	n and design of the example in figure 1 and		
must be printed legibly and conspicuously			
	outer circle and with the term, "USDA," in		
green overlaying a white upper semicircle	e and with the term, "organic," in white		
overlaying the green lower half circle; or			
	with black outer circle and black "USDA" on a		
	cle with a contrasting white or transparent		
"organic" on the black lower half circle.	Land Balletin and Carlotte		
	ay have four light lines running from left to		
	e right horizon to resemble a cultivated field.	E	4
E	TKO APPROVAL (This section is ETKO u	use only)	
Label can be approved	Label cannot be approved; please se	nd updated label	to ETKO
Data of American	Name and Clause True True	th.L.	
Date of Approval:	Name and Signature - ETKO Respons	Sible	

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To: AIAInbox@usda.gov
Cc: "ETKO certification"
Subject: ETKO ACA LIST

Date: Monday, January 05, 2015 8:34:30 AM

Attachments: <u>ETKO ACA 2014.xls</u>

Dear Renee

Here attached you can find ETKO ACA List for 2014 season.

Sorry for being late,

Kind regards and by this way we wish you a prosperous new year from ETKO.

Mustafa Akyuz

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			1			T
Certifying Agent	Certification #	Status	Crops	Livestock	Handling	Wild Crops	Grower Group	Grower Group Size	Last Name	First Name	Operation's Name
Etko - Ecological Farming Controlling Organization	2009	Certified	No	No	Yes	No	Yes	231	Hamza	Talia	Arisu Gida Dis Tic. A.s.
Etko - Ecological Farming Controlling Organization	2014	Certified	Yes	No	Yes	Yes	Yes	15	Hermse	Jan	Mezo Ekolojik Urunler
Etko - Ecological Farming Controlling Organization	2044	Certified	Yes	No	No	No	No		Gurdal	Arif	Arif Gurdal Tarim Isletmesi
Etko - Ecological Farming Controlling Organization	2058	Certified	No	No	Yes	No	No		Gok	Vuslat	Anadolu Etap Tarim Ve Gida Urunleri Amb San Tic As
Etko - Ecological Farming Controlling Organization	2070	Certified	Yes	No	Yes	No	No		Iscan	Nuri	Ozpa Gida Tarim Hayvancilik Insaat San. Ve Tic. A.S.
Etko - Ecological Farming Controlling Organization	2120	Certified	Yes	No	Yes	No	Yes	360	Kus	Sedat	Treko Tarim Gida Ic Ve Dis Tic Ltd Sti
Etko - Ecological Farming Controlling Organization	2158	Certified	Yes	No		Yes	No		Hur	Tugce	Susitas Su Urunleri Ve Sanayi Mamulleri Ihracat Tic As
Etko - Ecological Farming Controlling Organization	2190		No	No			No		Gultekin	Ebru	Asya Meyve Suyu Ve Gida San A.s.
Etko - Ecological Farming Controlling Organization		Certified		No			Yes		Kalkan	Ender	Kalkan Sebze Meyve Hay. Nak. Tur. Ltd. Sti.
Etko - Ecological Farming Controlling Organization		Certified		No			No		Goztepe	Sebahattin	Fine Food Gida San Ve Tic Ihr. Ith. A.s.
Etko - Ecological Farming Controlling Organization		Certified Certified		No			Yes	14	Taskin	Orhan Mehmet	Taskin Tarim Ltd. Sti.
Etko - Ecological Farming Controlling Organization	2387			No			No		Erensoy		Ares Organic Gida
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	2391 2453	Certified		No No			No No		Baydogan	Vahap Baran Servet	Vahap Baran Baydogan Oliva Gida Sanayi Tic. Ltd.Sti
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	2475	Certified		No			Yes	47	Altay Memur	Hayrettin	Meysan Organik Gida Tarim Urunleri San. Tic. Ltd. Sti.
Etko - Ecological Farming Controlling Organization	2484			No			No	47	Ahraz	Adem	Meysut Gida Ve Makine San. Tic. Ltd. Sti.
Etko - Ecological Farming Controlling Organization	2508	Certified		No			Yes	36		Kerem	Kalkan Organik
Etko - Ecological Farming Controlling Organization	2516	Certified	Yes	No		No	No	30	Hamza	Talia	Arin Gida Tarim Urunleri San. Ve Tic. Ltd. Sti.
Etko - Ecological Farming Controlling Organization	2527	Certified	No	No		No	No		Yilmaz	Sukru	Limkon Gida San Ve Tic As
Etko - Ecological Farming Controlling Organization	2534		No	No		No	No		Bali	Atilla	WBT Tarim
Etko - Ecological Farming Controlling Organization		Certified	Yes	No		No	Yes	21	Illeez	Tolga	Ekoturka TR
Etko - Ecological Farming Controlling Organization		Certified		No			No		lpek	Cafer	Cafer Ipek
Etko - Ecological Farming Controlling Organization		Certified		No			Yes		Ertetik	Engin	Bio Naturel Tarim Ur. Turz. Ve Dan. San. Ve Tic. Ltd. Sti
Etko - Ecological Farming Controlling Organization	2633	Certified		No			No		Sahin	Onur	Ason Dis Ticaret Limited Sirketi
Etko - Ecological Farming Controlling Organization	2650	Certified	Yes	No	Yes	No	No		Kaner	Ozlem	Dohler Marmara Gıda Sanayi A.s.
Etko - Ecological Farming Controlling Organization	2654	Certified		No		No	No		Kaya	Atif Yalcin	Nigella Tarim Hayvancilik Gida Peyzaj İns. San. Tic. Ltd. Sti
Etko - Ecological Farming Controlling Organization	2669	Certified		No		No	No		Yildirim	Cezmi	Gkm Gida ve Katki Maddeleri San. ve Tic. Ltd. Sti
Etko - Ecological Farming Controlling Organization	3006	Certified		No			Yes	5	Chemodanov	Vladimir	Spelta Ltd.
Etko - Ecological Farming Controlling Organization	3013	Certified		No			Yes		Rozinskiy	Dmitriy	Alef Ltd.
Etko - Ecological Farming Controlling Organization	3020	Certified	Yes	No			No			Khantsevarov Vasiliy	Region Agro Itd.
Etko - Ecological Farming Controlling Organization	3026	Certified	No	No			Yes		Sojnikow	Jaroslav	Sibnut Ltd
Etko - Ecological Farming Controlling Organization	3076	Certified	Yes	No		No	Yes		Vlasenko	Vladimir	Ukrainian Food Corporation Llc
Etko - Ecological Farming Controlling Organization		Certified	Yes	No		No	Yes		Sergeevich	Averchenko Stanislav	Too Proizvodstvenniy Komplex Mol-Tabys
Etko - Ecological Farming Controlling Organization		Certified		No			Yes			Kirill	Yugekotop Ltd
Etko - Ecological Farming Controlling Organization		Certified		No			Yes			Bogdan	Everi ltd.
Etko - Ecological Farming Controlling Organization		Certified Certified		No			Yes		Livinskiy	Anatoliy Valentin	Grainagro Ltd.
Etko - Ecological Farming Controlling Organization	3093			No			Yes		Sikoza		Dnepr2
Etko - Ecological Farming Controlling Organization	3094 3096	Certified Certified		No No			Yes No	4	Chemodanov Potapenko	Vladimir Maria	Polba Pe El Dorado Oils Llc
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	3114			No			Yes	10.00	Memur	Mesih	Farmeks Tarim Urunleri San Ve Tic Ltd Sti
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	3120	Certified		No			No			Natalia	Sadeko Organic
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	3121	Certified		No			Yes	17.00		Tolga	Ekoturka Ethiopia
Etko - Ecological Farming Controlling Organization Etko - Ecological Farming Controlling Organization	3126	Certified	Yes	No		No	Yes	2.00	Illeez	Tolga	Ekoturka Kirghizistan
Etko - Ecological Farming Controlling Organization	3127	Certified	Yes	No		No	Yes	5.00	Illeez	Tolga	Ekoturka Kazakhistan
Etko - Ecological Farming Controlling Organization	3128	Certified	Yes	No		No	Yes	5.00	Illeez	Tolga	Ekotuka Russia
Etko - Ecological Farming Controlling Organization	3132	Surrendered						****	Vasilenko	Alexander	Rodina Llc
Etko - Ecological Farming Controlling Organization	3138	Surrendered							Jungkil	Lee	Daehanfeed
Etko - Ecological Farming Controlling Organization		Certified		No	Yes	No	Yes		Vlasenko	Vladimir	Tov Prodexim Ltd
Etko - Ecological Farming Controlling Organization		Certified		No		No	No		Kackhovskiy	Alexiy	Ekolium Llc
Etko - Ecological Farming Controlling Organization	3142	Certified	Yes	No	Yes	No	No		Yongmun	Kwon	Seomjingang Rose Farm
Etko - Ecological Farming Controlling Organization	3149	Certified	Yes	No	Yes	No	No		Jangjin	Kim	Janghueng Musangim Co Ltd
Etko - Ecological Farming Controlling Organization	3170	Certified	Yes	No	Yes	No	Yes	6.00	Vladimirovich	Kaminskiy Andrey	Nt Nova Itd.
Etko - Ecological Farming Controlling Organization	3172	Certified	Yes	No		No	Yes	4.00	Sidorovich	Natalie	Art Seed Ltd.
Etko - Ecological Farming Controlling Organization	3180	Certified		No			Yes	4.00		Dmitriy	Kazecotrade Ltd.
Etko - Ecological Farming Controlling Organization	3193	Certified	No	No		No	No		Bugorskiy	Evgeniy	Ojsc Vinnytsa Oil-and-Fat-Production Plant
Etko - Ecological Farming Controlling Organization	3194	Certified	No	No		No	No		Victorovna	Lugovska Victoria	Nikmorservices Nikolaev Llc.
Etko - Ecological Farming Controlling Organization	3195	Certified	No	No	Yes	No	No		Victorovich	Lytvynov Iurii	Agro Supplies Llc
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Physical Address	Post Office Address (PO Box)	City
Kizilcasogut Beldesi-civril		Denizli
Antalya Org. San, 2. Cad No 10		Antalya
Hamzabali Mevkii Baltakoy Vedat Ciftci Ciftligi Cine Yolu 8.km		Aydin
Mersin- Tarsus Karayolu 10 Km Kazanli Kavsagi		Mersin
Organize san.blg.15. cadde no:13 Odunpazarı		Eskisehir
Ali Cetinkaya Blv No:34 K:4 D:401 Alsancak		Izmir
10040 Sok No: 25 loasb Cigli Tepeli Koyu Mevkii Egirdir		Izmir Isparta
Yenikoy Aksehir		Konya
Yenisehir Bursa Yolu 28 Km Yenice Kasabasi Yenisehir		Bursa
Ilica Kaplicalari 1.km Gediz		Kutahya
Osmanaga Mah. Sogutlucesme Cad. Abdullah Uzlar Is Merkezi No:92/87 Kadikoy		Istanbul
Ucukcetni koyu Kucukkuyu		Canakkale
Izmir Yolu Uzeri 4. km.Gaye Sanayi Sitesi Karsisi Soke		Aydın
Sarioglu Mh. Otcu Sk. Kayisi Ihr. Is Merkezi No: 43		Malatya
Dumlupinar Mah. 1522 Sok. Gorman Apt. K:1/4		Mersin
Yesilyurt Mah. 1107 Sok No:8 Nazilli Sirakapilar Mah.1583 Sk.No:28 Hikmetbey İshani K:1 D:7		Aydin
Ahsosb Adana - Ceyhan Yolu 28 Km. Yakapinar		Denizli Adana
Organize Sanayi Bölgesi 2. Cad. No: 10		Antalya
Petrol Mah. OSB 7.Cadde No.9		Adiyaman
Cumhuriyet Mh. Yaka Sokak No : 35/1 Derecine Kasabasi – Sultandagı		Afyonkarahisar
Mavisehir Mah. 6521 Sokak No.23/35 Karsiyaka		Izmir
Caddebostan Mah. Cami Sk. Selin Cıkmazı Edsan Apt. No:3 D:2 Kadikoy		Istanbul
Kocayatagi meyki oyakoy		Balikesir
Istiklal Mah Resadiye Cad. Yelkovan İs Merkezi Kat :4 No:1		Eskisehir
Dumlupinar Mah. 1522 Sok. Gorman Apt. K:1/4		Mersin
2, Frunze Str.,		Kherson
46, Sovetskaya str.,		Kherson
10, Naftovykiv Str., Elitnoe Village Novosibirsk District UI. Polevaya Str 30		Kherson Novosibirsk
5, Port-Elevator		Kherson
1 proezd Universalniy str.,		Severo-Kazakhstanskiy region
Lyagina str., 4/4, office 301		Nikolaev
14, Gmyreva str.,		Mykolayiv
12, Shevchenko avenue. off. 2.,		Odessa
10 Naftovykiv Street		Kherson
2 Frunze Str.		Kherson
8A, Rizhskaya str		Kyiv
Ege Serbest Bolgesi Nilufer Sk B Blok No: 2/2 Gaziemir		Izmir
14 Paravozna str		Kherson
Petrol Mah. OSB 7.Cadde No.9 Petrol Mah. OSB 7.Cadde No.9		Adiyaman
Petrol Mah. OSB 7.Cadde No.9		Adiyaman Adiyaman
Petrol Mah. OSB 7.Cadde No.9		Adiyaman
v.Pokrovskoye, Pokrovskiy district,		Dnipropetrovsk
3-14 Buksung-Dong, 1-Ka, jung-gu, Incheon		Incheon
5 Port-elevator		Kherson
9, Boryspilska Str		Kiev
1266-7, Daepyeong-ri, Gokseong-eup, Gokseong-gun		Jeollanam-do,
1478, Jangheung-daero, Gwansan-eup, Jangheung-gun		Jangheung-gun
11, Domostroitelnaya Str.,		Kherson
14, Parovoznaya str, 13, Koktem dist., Of.71, Kokshetau,		Kherson Akmolinskiy region,
26, Nemyrivske Shosse,		Vinnytsa
1/1, Grazhdanskiy spusk,		Nikolaev
27, Kaunasskaya str.,		Kiev

State/Province	Postal Code	Country	Telephone Number	Email Address
	20600	Turkey	+90 258 713 65 00	kivanckiper@arisugida.com
	07190	Turkey	+90 242 258 10 30	mezoinfo@mezoorganics.com
	09000	Turkey	+90 256 257 20 91	(b) (6)
	33000	Turkey	+90 324 221 59 61	info@etaptarimgida.com
	26000	Turkey	+90 222 416 71 71	(b) (c)
	35220 35620	Turkey Turkey	+90 232 465 19 93 +90 232 376 70 50	sk@trekotarim.com.tr
	32500	Turkey	+90 246 328 71 81	info@susitas.com asya@asyameyvesuyu.com.tr
	42550	Turkey	+90 332 817 70 20	(b) (6)
	16440	Turkey	+90 224 795 10 80	export@finefood.com.tr
	43780	Turkey	+90 274 431 52 80	info@taskintarim.com
	34710	Turkey	+90 216 347 12 97	(b) (6)
	17000	Turkey	+90 535 249 04 00	(b) (6)
	9000	Turkey	+90 256 554 64 67	(b) (6)
	44000	Turkey	+90 533 324 70 59	(b) (6)
	33000	Turkey	+90 324 645 43 44	fabrika@gkm-tr.com
	9800	Turkey	+90 256 231 13 84	info@kalkanorganic.com
	20000	Turkey	+90 258 713 65 00	kivanckiper@arisugida.com
	01350	Turkey	+90 322 394 47 77	limkon@limkon.com
	7190	Turkey	+90 242 258 10 30	atilla@wbttarim.com
	2100	Turkey	+90 416 227 24 01	tolga@ekoturca.com.tr
	3000	Turkey	+90 543 233 02 81	ipekorganik@hotmail.com
	35510	Turkey	+90 232 999 85 39	info@bionaturel.com.tr
	34000 10000	Turkey	+90 216 478 50 50	ason@asonitd.com
	26000	Turkey Turkey	+90 266 292 13 60 +90 505 495 49 48	ozlem.kaner@doehler-marmara.com
	33000	Turkey	+90 324 327 82 02	(b) (6) fabrika@gkm-tr.com
	73002	Ukraine	38055239-0377	office@spelta.com.ua
	73002	Ukraine	380552415195	alefltd@ukr.net
	73000	Ukraine	380552413067	(b) (6)
	63050	Russia	7383353-5228	info@vega-ek.de
	73000	Ukraine	38055242-5435	mtrade@prodexim.com.ua
	2222	Kazakhstan	77152461017	mega-sk@mail.ru
	54001	Ukraine	38067512-4561	(b) (6)
	54017	Ukraine	380-50-4920093	(b) (6)
ollanam-Do	65058	Ukraine	380-50-336-3499	(b) (6)
	73009	Ukraine	38055239-1074	commerces@mail.ru
	73002	Ukraine	38055249-2295	office@spelta.com.ua
	4112	Ukraine	38050338-8805	i.zayats@i.ua
	35410	Turkey	90533324-7059	(b) (6)
	73000	Ukraine	38055241-3361	ns@sadeko.com.ua
	2100	Turkey	90416227-2401	tolga@ekoturca.com.tr
	2100 2100	Turkey Turkey	90416227-2401	tolga@ekoturca.com.tr
	2100	Turkey	90416227-2401 90416227-2401	tolga@ekoturca.com.tr tolga@ekoturca.com.tr
	53600	Ukraine	380562382-1569	pavel.kulish@eurocom-ua.com
	400201	Korea, Republic of (South Korea)	8232770-1180	pavei.kulish@eurocom-ua.com
	73000	Ukraine	38055246-0690	mtrade@prodexim.com.ua
	2099	Ukraine	38050344-4265	(b) (6)
	1266-7	Korea, Republic of (South Korea)	8261363-3764	(b) (6)
	1478	Korea, Republic of (South Korea)	8261867-7755	(b) (6)
	73011	Ukraine	380-552-414851	office@nt-nova.com.ua
	73000	Ukraine	380-95-2772673	ns@sadeko.org
	2222	Kazakhstan	380552415195	alefltd@ukr.net
	21034	Ukraine	380 676 348399	kcgtrade@gmail.com
	54002	Ukraine	380-50-4937537	office@nikmorservices.com.ua
	2160	Ukraine	380-44-2053828	office@eurofinance.com.ua
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Organic Apple Juice Concentrate, Pear Juice Concentrate, Ouince Juice Concentrate, Ouince Juice Concentrate, Pomegranate Juice Concentrate, Discovery Purse, Apricot Purse, Organic Bay Leaves, Carob, Cistus, Fennel, Myrtle, Oregano, Rosemary, Sage, Savory, Sumac, Thyme, Vitex, Anis, Chikpeas, Barley, Clover, Wheat Organic Pomegranate

concentrate. Lemon peel oil and cell. Mandarin Juice concentrate. Orange Juice concentrate.

Orange cloudy concentrate, Orange comminuted, Orange peel oil and cell, Peach Puree, Pear Concentrate, Plum Puree, Raspberry Puree, Red beet Juice concentrate, Sour cherry Concentrate, Sour cherry puree, Strawberry Puree, Tomato Puree

Apple Concentrate, Apple Purse, Apple Purse, Apple Purse, Apple NFC fruit juice, Apple Aroma, Pears Concentrate, Pears Purse, Pears NFC fruit juice, Pears Aroma, Quince Purse, Quince Purse, Quince Purse, Quince Aroma, Pears Concentrate, Pomegranate Programme Aroma, Grapefruit Concentrate, Grapefruit NFC fruit juice, Grape

Organic Apple Concentarate, Aprile Concentarate, Pear Concentarate, Pe

Organic Fresh Apple, Strawberry, Cherry, Apricot, Sour Cherry, Walnut, Pear, Plum, Grape, Almond, Onion, Peach

Organic Frozen Cherry, Sour Cherry, Strawberry, Broccoli, Capia Pepper, Green Pepper, Onion, Peas And Tomatoes And Corn

Dried Apple, Almonds Kernel, Dried Apricots, Dried Bitter Orange, Dried Cherry, Dried Figs, Dried Grapes, Dried Lemon, Dried Orange, Dried Peach, Dried Pears, Dried Plum, Dried Quince, Dried Rosehip, Dried Sour Cherry, Dried Tomatoes

Organic Dried Sour cherry, Sour cherry IQF, Sour cherry IQF, Sour cherry IQF, Sour cherry Compote, Dried Plum, Plum IQF, Plum Compote, Dried Figs, Figs IQF, Figs Compote, Chestnut Fresh, Peach IQF, Peach IQF, Peach IQF, Peach IQF, Peach IQF, Strawberry I Organic Olive and Olive Oil

Organic cranberries

Organic Dried Figs, Dried Walnut, Fresh Chestnut, Fresh Chestnut, Fresh Olive, Dried Apricots, Dried Apricots, Dried Apricots, Dried Figs, Dried Mulberries, Dried Sour Cherry, Dried Sultana Raisins, Dried Tomatoes, Dried Fruit Mix, Dried Apples, Dried Apricots, Dried Apricots, Dried Red Lentils, Dried Green Lentils Organic locust bean gum

Organic Dried Figs and Apricots

Organic Apple, Apricot, Pear, Quince, Strawberry, Peach, Sour, Cherry, Pomegranate, Carrot, Black, Cherry

Organic Apple, Apricot, Black caarot, Carrot, Cherry, Grapefruit, Lemon, Mandarin, Orange, Peach, Pear, Pomgranate, Quince, Sour cherry, Strawberry and Tomatoes Juice Concentrate. Organic Apple, Apricot, Cherry, Peaches, Pears, Quince, Sourcherry, Strawberry and Tomatoes Puree. Apple, Cherry, Grapefruit, Lemon, Mandarin, Orange, Pears, Pomgranate, Quince, Sourcherry, Strawberry and Tomatoes Puree. Apple, Cherry, Grapefruit, Lemon, Mandarin, Orange, Pears, Pomgranate, Quince, Sourcherry, Strawberry and Tomatoes Puree. Apple, Cherry, Grapefruit, Lemon, Mandarin, Orange, Pears, Pomgranate, Quince, Sourcherry, Strawberry and Tomatoes Puree. Apple, Cherry, Grapefruit, Lemon, Mandarin, Orange, Pears, Pomgranate, Quince, Sourcherry, Strawberry, St Organic Bay Leaves, Carob, Cistus, Fennel, Myrtle, Oregano, Rosemary, Sage, Savory, Sumac, Thyme, Vitex, Anis, Chikpeas, Barley, Clover, Wheat

Organic Anis, Apricot, Barley, Beans, Canola, Chickpeas, Corn, Cotton, Cumin, Fig, Flaxseed, Mugbean (green), Lentilis (green, red, yellow), Hazelinut, Millet, Mustard, Oat, Peas, Pistachio, Raisin, Rice, Rye, Safflower, Sesame, Sorghum, Soybean, Bean (speackled), Sunflower, Vetch, Wheat,

Organic Plum, Cherry and Sour Cherry

Organic Cherry, Peach, Plum, Grapes and Olives

Organic Barley, Wheat, Maize, Sorghum, Oat, Rye, Triticale, Millet, Pistachio, Hazelnuts, Flax Seed Oil, Sunflower Seed Oil, Grape Seed Oil, Apricot Seed Oil, Chickpeas, Red Beans, White Beans, Green Mung beans, Red Lentils, Green Lentils, Yellow Lentils, Pea Beans, Soybeans, Kidney Br Organic Apple Puree Concentrate, April Puree, Pear Puree Concentrate, April Puree, Pear Puree, Concentrate, Plum Puree, Quince Puree, Quince Puree, Concentrate, Red Pepper Puree Concentrate, Plum Puree, Pear Puree, Pear Puree, Pear Puree, Pear Puree, Quince Puree, Quince Puree, Quince Puree, Concentrate, Plum Puree, Sour Cherry Puree, Sour Cherry Puree, Sour Cherry Puree, Pear Puree, Pea Organic Fresh Pears, Fresh Raspberries, Fresh Grapes, Fresh Quince, Fresh Almonds, Fresh Almonds, Fresh Almonds, Fresh Almonds, Fresh Potato, Fresh Potato, Fresh Peaches, Fresh Peaches, Fresh Potato Organic Carob Fruit, Locust Bean Gum, Kibbled Carob Cubes, Carob Germ, Toasted Carob Powder, Carob Molasses, Clear Carob Syrup, Carob Fiber

Organic Barley, Corn, Flax, Mustard Seeds, Mustard Oil, Mustard Cake/Expeller, Peas, Rapeseeds Rapeseeds Oil, Rapeseeds Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds.

Organic Alfalfa Seeds, Barley Seeds, Buckwheat Seeds, Crinckpea Seeds, Corn Seeds, Crippe Fresh, Lentil Seeds, Mustard Cake/Expeller, Oat Seeds, Rapeseed Seeds, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seed, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Rapeseed Seeds, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seed, Soybean Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seeds, Soybean Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seeds, Soybean Seeds, Soybean Oil, Mustard Cake/Expeller, Oat Seeds, Pageseed Seeds, Rapeseed Cake/Expeller, Rye Seeds, Soybean Seeds, Organic Alfalfa Seeds, Alfalfa Cake, Barley Seeds, Buckwheat Seeds, Corn Seeds, Corn Seeds, Corn Seeds, Corn Seeds, Sorohum Seed, Sovobean Seeds, Sovobean Seeds, Rapeseed Seeds, Rapeseed Cake, Right Seeds, Safflower Oil, Safflower Organic Cedar Pine Nut Kernel, Cedar Pine Nut Kernel Oil

Organic Alfalfa Seeds, Alfalfa Cake/Expeller, Cherry Fresh, Corn Seeds, Corn Grouts, Corn Flour Meal, Grape Fresh, Mustard Oil, Mustard Cake/Expeller, Peach Fresh, Peas Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Cherry Fresh, Corn Seeds, Soybean Oil, Organic Barley Seeds, Camelina Seeds, Camelina Seeds, Camelina Seeds, Flax Seeds, Flax Seeds, Flax Oil, Flax Cake/Expeller, Mustard Oil

Organic Alfalfa Seeds, Alfalfa Hay, Alfalfa Pellets, Barley Seeds, Corn Seeds, Flax Seeds, Flax Seeds, Flax Oil, Flax Cake/Expeller, Lupine Seeds, Oat Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seed, Sugar Beet Pulp Pellets/Molasses, Sunflower Oil, Sunflow Organic Alfalfa Seeds, Alfalfa Hay, Alfalfa Pellets, Barley Seeds, Corn Seeds, Flax Seeds, Flax Oil, Flax Cake/Expeller, Lupine Seeds, Oat Seeds, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seed, Sugar Beet Pulp Pellets/Molasses, Sunflower Oil, Sun Organic Barley Seeds, Buckwheat Seeds, Corn Seeds, Flax Oil, Flax Cake/Expeller, Lupine Seeds, Mustard Seeds, Mustard Seeds, Mustard Seeds, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Rye Seed, Sorghum Seed, Sugar Beet Cake/Expeller, Sunflower See Organic Alfalfa Seeds, Alfalfa Cake, Barley Seeds, Buckwheat Seeds, Corn Seeds, Corn Seeds, Corn Seeds, Corn Seeds, Sunflower Cit. Sunflower Cake, Triticale See Organic Alfalfa Seeds, Alfalfa Seeds, Sunflower Oil, Sunflower Oil, Soybean Oil, Soybean Cake, Sunflower Seeds, Sunflower Oil,

Organic Barley Seeds, Barley Grouts, Buckwheat Seeds, Buckwheat Grouts, Corn Seeds, Corn Grouts, Corn Flour Meal, Flax Seeds, Flax Oil, Flax Cake/Expeller, Millet Grouts, Mustard Seeds, Mustard Oil, Mustard Cake/Expeller, Oat Seeds, Oat Grouts, Oat Flour Meal, Peas Seeds, Peas Grouts, Pumpkin Kernel, Rapeseed Seeds, Rapes Organic Dried Apricot, Mulberry, Pear, Sourcherry, Tomatoes, Raisins, Walnut, Diced, Paste, Kernel, Kernel Powder of Apricot.

Organic Barley Seeds, Barley Grouts, Beans Seeds, Beans Grouts, Buckwheat Seeds, Buckwheat Grouts, Chickpea Grouts, Corin Grouts, Corn Grouts, Corn Grouts, Corn Grouts, Corn Grouts, Corn Grouts, Corn Grouts, Grouts Organic Sesame, Mungbean (green), Beans, Maize, Soybean, Sorghum, Rice, Cotton

Organic Cotton, Beans, Mung bean (green), Wheat

Organic Alfalfa, Wheat, Barley, Oat, Corn, Flaxseed, Chickpeas, Maize, Mustard, Peas (yellow), Rapeseeds, Rye, Soybean, Sunflower, Vetch, Millet, Buckwheat, Safflower

Organic Alfalfa, Wheat, Barley, Oat, Corn, Flaxseed, Chickpeas, Maize, Mustard, Peas (yellow), Rapeseeds, Rye, Soybean, Sunflower, Vetch, Millet

Organic Alfalfa Seeds, Alfalfa Cake/Expeller, Cherry Fresh, Corn Seeds, Corn Grouts, Corn Flour Meal, Grape Fresh, Mustard Oil, Mustard Cake/Expeller, Peach Fresh, Peas Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Soybean Oil, Soybean Oil, Soybean Cake/Expeller, Strawberry, Fresh, Sunflo Organic Barley Seeds, Barley Grouts, Barley Grouts, Barley Flakes, Buckwheat Seeds, Buckwheat Flakes, Corn Grouts, Corn Flour Meal, Corn Flakes, Flax Seeds, Flax Oil, Flax Cake/Expeller, Lupine Seeds, Millet Seeds, Millet Flour Meal, Millet Flakes, Mustard Oil, Mustard Oil, Mustard Oil, Mustard Cake/Expeller, Upine Seeds, Millet Flaxes, Mustard Grouts, Millet Flaxes, Flax Seeds, Mustard Seeds, Millet Flaxes, Flax Seeds, Mustard Seeds, Mustard Oil, Mustard Cake/Expeller, Upine Seeds, Millet Flaxes, Flax Seeds, Flax Seeds, Flax Oil, Flax Cake/Expeller, Upine Seeds, Millet Flaxes, Flax Seeds, Mustard S Organic rose

Organic seaweed

Owanic Barley Seeds, Corn Seeds, Flax Seeds, Millet Seeds, Mustard Seeds, Peas Seeds, Pumpkin kernel, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Sorghum Seed, Soybean Seeds, Soybean Cake, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds.

Organic Barley Seeds, Barley Grouts, Corn Geeds, Corn Grouts, Corn Geeds, Corn Grouts, Corn Flour Meal, Millet Seeds, Millet Flour Meal, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Sorghum Seeds, Soybean Oil, Soybean Cake/Expeller, sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Sunflower Oil, Soybean Oil, Soy Organic Barley Seeds, Barley Grouts, Flax Seeds, Flax Oil, Flax Cake/Expeller, Oat Seeds, Oat flour, Peas Seeds, Peas Grouts, potato fresh, Rapeseed Oil, Rapeseed Cake/Expeller, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds, Wheat Flour, Peas Seeds, Peas Grouts, potato fresh, Rapeseed Oil,

Organic Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Soybean Seeds, Soybean Oil, Soybean Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunflower O Organic Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller,

Organic Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller,

fruit Aroma, Orange Concentrate, Orange NFC fruit juice, Orange Aroma, Lemon NFC fruit juice, Lemon NFC fruit juice, Mandarin NFC fruit juice, Mandarin Aroma, Strawberry NFC fi

ompote, Pepper IQF, Dried Onions, Onions IQF

, Dried Beans, Dried Bulgur

'omegranate, Quince, Sourcherry, and Strawberry NFC Fruit Juice. Apple, Apricot, Black carrots, Carrot, Cherry, Grapefruits, Lemon, Mandarin, Orange, Peach, Pears, Pomegranate, Quince, Sourcherry, Strawberry and Tomatoes Aroma.

eans, Rice, Dried Sesame, Dried Figs, Dried Apricots, Dried Grape, Dried Plum, Dried Mulberry

herry Puree Concentrate

ser, Fresh Celery, Fresh Leek, Fresh Gold Strawberry, Fresh Stuffed Pepper, Cayenne Pepper, Fresh Melon, Fresh Molon, Fresh Orinion, Fresh Garlic, Fresh Stonic, Fresh Stonic, Fresh Poas, Organic Tarhana, Organic Tomato Sauce, Organic Eggplant with Basil Sauce, Organic Apple Vineç

Soybean Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds.

ın Oil, Soybean Cake, Sunflower Seeds, Sunflower Oil, Sunflower Cake, Wheat Seeds.

wer Seeds. Sunflower Oil. Sunflower Cake/Expeller. Walnut Kernel, Wheat Seeds. Wheat Grouts. Wheat Flour Meal.

nel, Wheat Seeds.

nel, Wheat Seeds.

ds, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds.

eds. Wheat Seeds.

seed Oil, Rapeseed Cake/Expeller, Rye Seeds, Rye Grouts, Rye Flour Meal, Sorghum Seeds, Sorghum Flour Meal, Soybean Oil, Soybean Cake/Expeller, Sunflower Oil, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds, Wheat Grouts, Wheat Flour Meal.

ustard Oil, Mustard Cake/Expeller, Oat Seeds, Rye Flour Meal, Sorghum Seeds, Soybean Oil, Soybean Cake/Expeller, Qat Seeds, Rye Flour Meal, Sorghum Seeds, Soybean Oil, Soybean Cake/Expeller, Soybean Cake/Expeller, Oat Seeds, Soybean Oil, Soybean Cake/Expeller, Oat Seeds, Soybean Oil, Soybean Cake/Expeller, Oat Seeds, Soybean Oil, Soybean Cake/Expeller, Oat Seeds, Oat Grouts, Pumpkin Seeds, Soybean Oil, Soybean Cake/Expeller, Oat Seeds, Oat Grouts, Pumpkin Seeds, Soybean Oil, Soybean Cake/Expeller, Oat Seeds, Oat Grouts, Pumpkin Seeds, Soybean Oil, Soybean Oi

wer Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds, Wheat Grouts, Wheat Flour Meal.

Oat Seeds, Oat Grouts, Oat Flakes, Oat Brans, Oat Flakes, Oat Brans, Oat Flour Meal, Peas Seeds, Peas Grouts, Peas Flakes, Pumpkin Kernel, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Rye Seeds, Rye Grouts, Rye Flour Meal, Rye Flakes, Rye Brans, Rye Pasta, Sorghum Seeds, Soybean Oil, Soybean Oil, Soybean Cake/Expeller, Spelt (Wheat) Seed

eat Flour Meal, Wheat Bran, Wheat Semolina.

ruit juice, Strawberry Aroma, Sour Cherry Concentrate, Sour Cherry Puree, Sour Cherry NFC fruit juice, Sour Cherry Aroma, Cherry Concentrate, Cherry Puree, Cherry NFC fruit juice, Cherry Aroma, Tomato Concentrate, Tomato Puree, Tomato Aroma, Apricot Concentrate, Apricot Puree, Apricot Aroma, Peaches Concentrate, Peaches Puree, Peaches
3ar, Organic home-made pasta, Grape Vinegar, Boiled Grape Juice, Mixed pickles, Dried Tomatoes, Dried Golden Berry, Boiled Apple juices
ver Cake/Expeller, Wheat Seeds, Wheat Grouts, Wheat Flour Meal, Wheat Semolina.
s, Spelt (Wheat) Grouts, Spelt (Wheat) Flakes, Spelt (Wheat) Brans, Spelt (Wheat) Pasta, Spelt (Wheat) Flour Meal, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds, Wheat Grouts, Wheat Flour Meal, Wheat Bran, Wheat Pasta, Walnut Kernel.

From: ma@etko.org

To: Zuck Penelope - AMS; Yang RobertH - AMS; AMS - AIAinbox

Cc: "Fatih AKSOY"

FW: Registered: Notice of Non-compliance - Onsite Assessment Subject:

Date: Tuesday, June 23, 2015 5:56:56 PM

Attachments: ~WRD000.jpg image001.png

Program Annual Training 2015 NOP-COR-IACB.doc

Dear Ms Zuck, Mr Young

Please find attached training plan which we will realise soon in order to correct the noncompliances.

I will send you after the training updated proceudres and results of the training as proof of corrective actions.

Sincerely

Mustafa Akyuz **ETKO Turkey**

From: ma@etko.org [mailto:ma@etko.org] Sent: Saturday, June 13, 2015 12:50 AM

To: 'Zuck Penelope - AMS'; 'Yang, RobertH - AMS'

Cc: 'AIAInbox@usda.gov'; 'Fatih AKSOY'

Subject: RE: Registered: Notice of Non-compliance - Onsite Assessment

Mrs Zuck

You can find attached ETKO Letter and Corrective Action Plan. For any remaining questions I am at your disposal.

Sincerely

Mustafa Akyuz

ETKO Turkey

160 Sokak No: 13/3 35100 Bornova

Izmir – Turkey. www.etko.org

From: Penelope.Zuck@ams.usda.gov [mailto:Penelope.Zuck@ams.usda.gov]

Sent: Wednesday, May 13, 2015 9:22 PM

To: ma@etko.org

Cc: AlAinbox@ams.usda.gov; Renee.Mann@ams.usda.gov; RobertH.Yang@ams.usda.gov

Subject: Registered: Notice of Non-compliance - Onsite Assessment



This is a Registered Email[®] message from **Zuck Penelope - AMS**.

Dear Dr. Mustafa Akyuz,

Attached to this email is the NOP Notice of Noncompliance including the findings of the Ecological Farming Control Organization audit conducted on May 12-16, 2014. Corrective actions are due within 30 days of receipt of this notice.

A copy of the assessment report, NP4132LCA, is attached for your reference.

If you have questions on this notice, please do not hesitate to contact your Accreditation Manager, Robert Yang, at 202-690-4540 or RobertH.Yang@ams.usda.gov.

Best 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 | Join the NOP mailing list

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ETKO ORGANIC INSPECTION AND CERTIFICATION TRAINING PROGRAM NOP- COR- IACB

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ETKO NOP – COR and IACB EĞİTİM PROGRAMI

(06-09 July/Temmuz 2015)

PARTICIPANTS - KATILIMCILAR

Related ETKO Stuff and Advisory Committee Members – İlgili ETKO Personeli ve Danışma Komitesi Üyeleri

Address: ETKO office - IZMIR

Program

Day 1 - 06 July/Temmuz 2015 Monday/Pazartesi

Time	Trainor	Subject	Procedures	Purpose
09.30 -	MA	NOP, COR and IACB Standard	OP 01	Introduction, purpose, expectations
10.00		NOP, COR ve IACB Standardı	GP 18	
		hakkında bilgilendirme		
10.00 -	FA	IACB Standards, NOP, COR		Explaining general system changes,
12.30		Regulation - Eşdeğer IACB		important aspects Agriculture, Process and
		Standardı ve NOP, COR		Wild collection. Ziraat, Doğal toplama ve
		Yönetmeliği		Proses.
				Review: Application package, OCP and certification review
				Onsite inspection for production,
				document control, record keeping, input-
				output balance assessment, propagation
				material approval, retroactive recognition
12.30 -		Break		
13.30				
13.30 -	MA	ETKO Inspection & Certification		Updated inspection and certification
14.00		Procedures OP 01		documents
14.00 -	YY	OP 03 Testing, TI 05 Sampling		How to take samples, transport,
14.30		Method, TI 40 NOP Guide Testing		laboratories, what to analyze, assessment
		& Enforcement Action		of the results
14.30 -	MA	Risk analyses, Investigation of		
15.00		irregularities, unannounced		
		inspections		
15.00 -		Break –Mola		
15.15				
15.15 –	BG	Label assessment		
15.45				
15.45 –		Workshops		Group 1: Review: Aim of the review,
17.00				benefits, difficulties, type of reviews
				Group 2: Propagation material approval,
				seeds
				Group 3: Retroactive recognition
17.00 –		Presentation of workshop results		
18.00				
		Day2 - 07 July/Temmuz		
		2015 Tuesday/Salı		



ETKO ORGANIC INSPECTION AND CERTIFICATION TRAINING PROGRAM NOP- COR- IACB

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ETKO NOP – COR and IACB EĞİTİM PROGRAMI

09.00 - 10.30	MA FA, ES SY YY BG ID HK	ETKO NOP Certification Procedure GP 18. ETKO Nop Sertifikasyon Prosedürü GP18.	Following topics will be explained: 1-How to use Regulations. (MA) 2-Labelling and label approval (BG) 3-National List 205&600-606 (YY) 4-Organic production and handling system plan 205&201 (FA) 5-Land requirements 205&202, buffer zone practice (ES) 6-Soil fertility and crop nutrient management 205&203 (HK) 7-Seeds and planting stock 205&204 (ID) 8-Crop rotation standard 205&205 (ID) 9-Pest, weed and disease management 205&206 (YY) 10-Wild crop harvesting 205&207, (SY) 11-Buffer zone practice will be studied and buffer zone evaluations will be made onsite. Inspectors will be monitored for this practice.
10.45		S. can	
10.45 -	MA	NOP Adverse Action Procedure:	National Organic Program. These
12.30		1-Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix. January 20, 2015, 2-NOP Penalty Matrix 2612 and 3-NOP 4011 Adverse Action Appeal Process for the	documents will be translated in Turkish in order to provide better understanding of the procedures by involved ETKO stuff members.
12.30 – 13.30	BREAK		
13.30 - 15.00	SY	Grower Groups Inspection	What is the structure of a grower group, what aspects are the most important for inspection, how to do a grower group inspection
15.00 -	BREAK		
15.15 15.15 – 16.30		Workshops	Group 1: Example Review of OCP-Process identifying NCs Group 2: Example Review of OCP-Agriculture identifying NCs Group 3: Example Review of OCP-Wild collection identifying NCs How to identify noncompliance and report it, acc to IACB and NOP.
16.30 – 17.00		Presentation of workshop results	
17.00 – 18.00		Test	



09.00 - 19.00

ETKO ORGANIC INSPECTION AND CERTIFICATION TRAINING PROGRAM NOP- COR- IACB ETKO NOP - COR and IACB EĞİTİM PROGRAMI

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<u>Day4-09 July/Temmuz 2015 Thursday/Persembe Onsite Inspection Training Process NOP/COR/IACB</u>

Agriculture inspection. Treko/Arısu

09.00 – 19.00 Processing inspection Arısu

 From:
 ma@etko.com.tr

 To:
 Reid, John - AMS

 Cc:
 AMS - AIAinbox

Subject: RE: [REMINDER] Notice of Accreditation Expiration - ETKO

Date: Saturday, February 04, 2017 10:13:39 AM

Attachments: <u>image001.jpg</u>

Mr Reid

Thank you for information, we will prepare necessary documents timely and provide you.

Sincerely

Mustafa Akyuz

ETKO – Turkey +90-232-3397606 +90-232-3397607 www.etko.com.tr

From: Reid, John - AMS [mailto:John.Reid@ams.usda.gov]

Sent: Friday, February 03, 2017 11:56 PM

To: ma@etko.com.tr **Cc:** AMS - AlAinbox

Subject: [REMINDER] Notice of Accreditation Expiration - ETKO

Importance: High

Dear Ecological Farming Control Organization:

The United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) is issuing this letter as a Notice of Impending Expiration of Accreditation, according to 7 CFR §§ 205.510(c)(1) and (2).

To avoid a lapse in accreditation, certifying agents must apply for renewal of accreditation at least 6 months prior to the [15th] anniversary of issuance of the Notification of Accreditation and each subsequent renewal of accreditation. The expiration accreditation date for ETKO is **1/22/18**, therefore your Application for Accreditation and all associated materials are due 6 months before this date.

The attached Annex 1 document provides instructions on what information and materials to submit with your accreditation renewal application.

The accreditation of certifying agents who make timely application for renewal of accreditation will not expire during the renewal process. The accreditation of certifying agents who fail to make timely application for renewal of accreditation will expire as scheduled unless renewed prior to the

scheduled expiration date. Certifying agents with an expired accreditation must not perform certification activities under the Act and USDA organic Regulations.

Following ETKO results of its accreditation renewal assessment, the AMS Administrator will determine whether the certifying agent remains in compliance with the Act and USDA organic regulations. Upon a determination that ETKO is in compliance, the AMS Administrator will issue accreditation renewal. If the AMS Administrator determines that ETKO is not in compliance with the Act and USDA organic regulations, the AMS Administrator will issue a denial of accreditation renewal.

We look forward to receiving and reviewing your materials.

Please feel free to contact me with any questions or concerns.

Respectfully,

John A. Reid

Program/Database Analyst
USDA | National Organic Program

1400 Independence Avenue SW | 2649-S | Washington DC 20250

Main: (202) 260-9452 | Cell: (b) (6)

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From: Davis, Graham - AMS AMS - AIAinbox

Subject: RE: Corrective Action Report- ETKO Date: Tuesday, January 10, 2017 7:57:27 AM

Attachments: image002 jpg

image004 jpg

Good to know. I think I have been sending them incorrectly for almost a year.

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: AMS - AlAinbox

Sent: Tuesday, January 10, 2017 7:55 AM

To: Davis, Graham - AMS < Graham. Davis@ams.usda.gov>

Subject: RE: Corrective Action Report- ETKO

Hi Graham,

When you send these, please turn the Word document into a PDF so the certifier can use the PDF to pull the text of the noncompliances. If you just scan the document, they have a hard time doing this.

Thanks, Renee

Renee Mann

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

From: Graham.Davis@ams.usda.gov [mailto:Graham.Davis@ams.usda.gov]

Sent: Tuesday, January 10, 2017 7:23 AM

To: ma@etko.com.tr

Cc: AMS - AlAinbox < AlAinbox@ams.usda.gov> Subject: Registered: Corrective Action Report- ETKO



This is a Registered Email® message from Davis Graham - AMS.

Dear Dr. Akyuz,

Thank you for the submission of the corrective action plan on July 3, 2014. The USDA National Organic Program has reviewed your corrective action plan and found it to adequately address the concerns identified. During the next onsite assessment, we will verify that you have successfully implemented these changes and that the problem has not recurred.

Please contact me with any questions you may have.

Sincerely,

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:
 ma@etko.org

 To:
 AMS - AIAinbox

 Cc:
 McElroy, Bridget - AMS

Subject: RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

Date: Friday, March 18, 2016 1:44:23 PM

Dear Anne, Bridget

ETKO does not certify production of mentioned systems for NOP.

Hope this information is helpfull

Have a nice weekend.

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606 F: +90-232-3397607 www.etko.org

From: Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] On Behalf Of AMS - AlAinbox

Sent: Wednesday, March 16, 2016 9:30 PM

To: AMS - AlAinbox

Subject: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at bridget.mcelroy@ams.usda.gov as soon as possible. The original message with instructions is below.

Regards,

Cheri Courtney

Director, Accreditation and International Activities Division

Original Message

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

.

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: bridget.mcelroy@ams.usda.gov. You can also contact Bridget with any questions that you have.

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From: Mann, Renee - AMS

To: Courtney, Cheri - AMS; AMS - AIAinbox
Subject: RE: Revocation of Certification NT NOVA
Date: Monday, May 18, 2015 4:41:08 PM

Attachments: <u>image001.png</u>

Hi Mario -

FYI – you would need to change the list of certified operations to identify this company as "Revoked."

Thanks,

Renee M

Renee Mann

Assistant Director, Accreditation and International Activities Division USDA National Organic Program (202) 260-8635

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From: Courtney, Cheri - AMS

Sent: Tuesday, May 12, 2015 9:26 AM To: AMS - AIAinbox; Mann, Renee - AMS

Subject: RE: Revocation of Certification NT NOVA

Mario it appears this revocation was sent to the AIA inbox in error it should have been sent to NOPPACAAdverseActions@ams.usda.gov.

FYI -A revocation is similar to a suspension in that, if a certified operation is revoked it cannot sell product as organic. The major difference is if a certified operation is revoked it is ineligible for certification 5 years per the 205.662 (f)(2) - the regulations do not specify a timeframe for a suspension.

Regards,

Cheri

From: Essig, Mario - AMS On Behalf Of AMS - AIAinbox

Sent: Monday, May 11, 2015 12:42 PM

To: Courtney, Cheri - AMS; Mann, Renee - AMS Subject: FW: Revocation of Certification NT NOVA

Hi Cheri and Renee,

Here is a revocation to be assigned.

Regards,

Mario Essig



USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250

Mario.Essig@ams.usda.gov Office #: 202.779.9466 NOP website

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From: ma@etko.org [mailto:ma@etko.org]
Sent: Thursday, April 30, 2015 6:47 AM

To: AMS - AIAinbox Cc: 'Fatih Aksoy'

Subject: Revocation of Certification NT NOVA

Dear Madam / Sir

We would like to inform you that we revoked the NOP certification of NT Nova from Ukraine due to recent violation of the organic regulations.

Here you can find attached Notification and related Annexes.

FYI: The product exported and subjected to residue problems was only certified according to EU Regulation.

I hope to inform you duly.

For any questions I am at your disposal.

Mustafa Akyuz Man. Dir. ETKO Turkey. T:+90-232-3397606 F: +90-232-3397607 From: Penelope.Zuck@ams.usda.gov on behalf of Zuck_Penelope - AMS

To: <u>mustafakyuz@hotmail.com</u>

Cc: AMS - AIAinbox; Claypool Rebecca E - AMS
Subject: Registered: Corrective Action Report - NP4132LCA

Date: Tuesday, July 19, 2016 1:31:28 PM

Attachments: image001.png

NP4132LCA ETKO CA letter 07 19 16.pdf NP4132LCA ETKO CA Report Settlement 07 19 16.pdf



This is a Registered Email® message from Zuck Penelope - AMS.

Dear Mustafa,

Attached is the Corrective Action Report in accordance with the terms of the Settlement Agreement. Please let me know if you have any questions.

Best Regards,

Penny



PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER

USDA • AMS • NOP | 1400 Independence Ave SW| 2649-S | Washington DC 20250

2 202.260.9444 | Fax 202.205.7808 | ⊠ Penelope.Zuck@ams.usda.gov

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

JUL 1 9 2016

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

Dear Dr. Akyuz:

On December 18, 2015, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), issued a Notice of Proposed Suspension of Ecological Farming Control Organization's (ETKO) accreditation as a result of the renewal assessment, which was appealed by ETKO. According to the terms of the executed Settlement Agreement APL-008-16 between the USDA-AMS and ETKO, the NOP accepts ETKO's corrective and preventative actions submitted in response to the NOP's May 13, 2015 Notice of Noncompliance.

The six noncompliances (NP4132LCA.NC1 – NC6) identified during the Renewal Assessment, and one noncompliance (NP9222ZZA.NC21) outstanding from the previous assessment were determined to be adequately addressed. See enclosed Corrective Action Report.

In addition, according to the terms of the Settlement Agreement, ETKO agrees to a site-evaluation at ETKO's expense, in accordance with 7 CFR parts 205.508(b) and 205.640(a), within twelve (12) months. The site-evaluation will focus on verifying implementation of the corrective and preventive actions outlined in the Corrective Action Report; a review of nonconformances issued by international accreditation bodies that resulted in the conditional losses of accreditation to the ISO 17065 Standard, the Canadian Food Inspection Agency's Canada Organic Regime, and the European Union Commission's 3rd country recognition as a certifying body; and a review of the corresponding corrective and preventive actions implemented to address the noconformances.

If you have any questions about this notice or the USDA organic regulations, please contact Penny Zuck, Accreditation Manager, at Penelope.Zuck@ams.usda.gov or (202) 260-9444.

Sincerely,

Miles W McEvoy
Deputy Administrator

National Organic Program

Enclosures: Corrective Action Report

cc: AIA Inbox



NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

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

GENERAL INFORMATION

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

Organizational Structure:

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

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

ETKO employees 22 staff members that are involved in USDA organic certification. The staff consists of five administrative personnel and 17 technical personnel which also conduct inspections. No contract inspectors are used.

NOP DETERMINATION:

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

Non-compliances from Prior Assessments

Any noncompliance labeled as "Cleared," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "Outstanding" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "Accepted," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP7199OOA.NC3 - Cleared

NP7199OOA.NC5 - Cleared

NP7199OOA.NC6 - Cleared

NP8050OOA.NC1 - Cleared

NP8050OOA.NC2 - Cleared

NP9222ZZA.NC1 - Cleared

NP9222ZZA.NC2 - Cleared

NP9222ZZA.NC3 – Cleared

NP9222ZZA.NC4 - Cleared

NP9222ZZA.NC5 - Cleared

NP9222ZZA.NC6 – Withdrawn

NP9222ZZA.NC7 - Cleared

NP9222ZZA.NC8 - Cleared

NP9222ZZA.NC10 – Cleared NP9222ZZA.NC10 – Cleared NP9222ZZA.NC11 – Cleared NP9222ZZA.NC12 – Cleared NP9222ZZA.NC13 – Cleared NP9222ZZA.NC14 – Cleared NP9222ZZA.NC15 – Cleared NP9222ZZA.NC16 – Cleared NP9222ZZA.NC17 – Cleared NP9222ZZA.NC18 – Cleared NP9222ZZA.NC19 – Cleared NP9222ZZA.NC20 – Cleared

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

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

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

- 1. Label review the label review checklist did not include USDA organic regulation label requirements to be verified.
- 2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
- 3. OCP templates state the incorrect USDA organic regulations.
- 4. Inspectors are using outdated USDA organic regulations (2010).
- 5. Inspectors and reviewers not readily able to look up regulations.
- 6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.

- 7. Several crop operation OCPs reviewed by the NOP auditor indicated "Not Applicable" for Crop Rotation practice standard (205.205).
- 8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

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

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

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

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

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

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

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

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

2015 Corrective Action: ETKO submitted copies of corrected certificates identifying the scopes of certification. To prevent this from recurring, ETKO has updated the certificate template and the corrected form will now be used. ETKO submitted a copy of the revised template document with the correct NOP scopes of certification.

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

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

2015 Corrective Action: ETKO has updated their procedures and trained staff and inspectors on the following: NOP 4002 Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix, NOP Penalty Matrix 2612 and NOP 4011 Adverse Action Appeal Process for the NOP. These documents were translated into Turkish in order to provide better understanding of the procedures by NOP involved ETKO staff members. The translated documents, training documents and agenda were submitted to NOP. Further, ETKO will check the NOP Handbook regularly and pertinent documents will be translated immediately. Translated documents will be studied with related staff and inspectors. ETKO submitted NOP Handbook documents to NOP as they were being translated.

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

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

1. Inspectors did not completely verify the information stated in the Organic Compliance Plans. If observations and interviews at the onsite inspection did not align with the

Organic Compliance Plan, the inspector failed to state this finding as an issue of concern.

- 2. ETKO inspectors are responsible for collecting large amounts of information about the operations when the Organic Compliance Plan (OCP) is incomplete or in error. The inspector did not note the finding as an issue of concern, failing to indicate that the OCP is incomplete. The inspector did not record these findings in the inspection report. Minor updates or adjustments to the OCP during the onsite inspection is acceptable and can be noted in the inspector's report.
- **3.** The inspection reports did not include a description and the outcome of the reconciliation activities (e.g. mass balance and audit trail audit) conducted by inspectors.

2015 Corrective Action: ETKO submitted documentation from the training it conducted with inspectors on the following topics: "1) Using and evaluation of OCP during onsite inspection; 2) Review of organic compliance plans and identifying noncompliances before inspections, in order to avoid losing time to collect large amount of information and documents; and 3) How to make input-output balance and report it." ETKO also submitted examples of completed inspection reports from inspectors showing input-output balance and updates to the inspection forms.

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

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

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

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

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

2015 Corrective Action: ETKO created a form to be used for inspection of Internal Control Systems for grower groups and revised the OCP to include the grower group Internal Control System requirement. ETKO updated its NOP Certification Procedure Manual with the requirements to document and verify Internal Control Systems. These forms and procedures will

be implemented this year for all grower groups. The forms and revised NOP Certification Procedure Manual were submitted to NOP. ETKO conducted training on this topic July 7, 2015. The training materials and an agenda were submitted to NOP.

From: Penelope.Zuck@ams.usda.gov on behalf of Zuck_Penelope - AMS

To: ma@etko.org

Cc: <u>Claypool Rebecca E - AMS; AMS - AIAinbox; AMS - NOPAppeals</u>

Subject: Registered: Notice of Non-compliance - AIA6155PZ

Date: Tuesday, June 21, 2016 8:51:30 AM Attachments: image001.png

AIA6155PZ ETKO AR NoNC 06 21 16.pdf



This is a Registered Email® message from Zuck Penelope - AMS

Dear Dr. Akyuz,

Please see the attached Notice of Noncompliance to the USDA organic regulations. Corrective actions are due within 30 days of receipt of this notice. If you have questions on this notice, please do not hesitate to contact me.

Best 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

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NOTICE OF NONCOMPLIANCE

JUN 2 1 2016

Mustafa Akyuz ETKO EKOLOJIC TARIM KONTROL ORG LTD STI 160 Sk. No. 13/7, 35040 Bornova – Izmir Turkey

Dear Dr. Akyuz:

On January 22, 2016, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) received the 2016 annual report from Ecological Farming Control Organization (ETKO). We have determined that ETKO is noncompliant with the USDA organic regulations, 7 CFR Part 205, in the following manner:

AIA6155PZ.NC1 - 7 CFR § 205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2603 Instruction Organic Certificates section 3.1 states, "Organic certificates should be issued in English and include the following (* identifies elements required by 7 CFR § 205.404 of the USDA organic regulations): ...Labeling category for each product certified under the handling/processing certification category (not required for products in the crops, wild crops, or livestock certification categories). Labeling categories: 100% Organic, Organic, Made with Organic (specified ingredients or food groups), and Livestock Feed (Organic or 100% Organic);..."

2016 Comments: ETKO's USDA-NOP organic certificates include the category title "100-95% organic" for products in the "organic" category of certification. "100-95% organic" is not a category of USDA organic certification. The categories are "100% organic", "organic", and "made with organic (specified ingredients or food group(s))."

In order to clear this noncompliance, ETKO must propose and implement measures that will correct this action and prevent future reoccurrences. The proposed corrective actions must also indicate how the ETKO management system will be modified to prevent a future noncompliance. Please submit proposed corrective actions to AIAInbox@ams.usda.gov within 30 days from the date of receipt of this letter, indicating how this noncompliance will be corrected. Please refer to NOP 2608, Responding to Noncompliances, for further instruction. Failure to promptly resolve this noncompliance may result in proposed adverse actions against ETKO as an accredited certifying agent for the USDA.

Page 2

If you have questions regarding this notice, please contact your Accreditation Manager, Rebecca Claypool, at Rebecca.E.Claypool@ams.usda.gov or (202) 350-5706.

Sincerely,

Chew Cay Iney Cheri Courtney

Director, Accreditation and International Activities Division

National Organic Program

cc: NOP Appeals

AIA Inbox