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

Thank you!

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
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, 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 Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
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  
St. Louis, Missouri 63132  
pdelaperouse@highquestpartners.com  
1-314-994-3282(o)  
1-314-812-8080(f)  
www.highquestpartners.com  
www.globalaginvesting.com
From: Tucker, Jennifer - AMS
To: Mann, Renee - AMS
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 <Miles.McEvoy@ams.usda.gov>
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)
Twitter: @NationalOrganic
Facebook: Facebook.com/NationalOrganicCoalition
Hi Renee,

I can respond to this, (b) (5)

Please let me know if that works for AIA.

--------------------------------------------------

Grainagro – Surrendered 8/8/2016
Ukrfield – Certified 11/1/2016

I can’t find any operations named “Dnepryanske” but did find:

Dnepryanske HPP (3220D-02) – Certified 11/17/2016 (NOP Operation ID 9963220002)

I can’t find any operations with Client ID 3092D-13, but did find another operation named

Dnepryanske HPP – Certified 12/3/15 (NOP Operation ID 9963092013)

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
Hi Stacy,
Is this something you can respond to?

Thanks,
Renee

---

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.

Saygılarımızla/ Best Regards

Ceren BAYAZIT
ETKO Ekolojik Tarım 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: nb@etko.com.tr, Web: www.etko.com.tr

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
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
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

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

---

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
Dear Sirs,

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

Thank you.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

---

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 AlAInbox@ams.usda.gov 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 AIAInbox@ams.usda.gov.

Thank you,

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

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
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 <Rebecca.E.Claypool@ams.usda.gov>
Subject: ETKO Settlement?

Hey,

While updating the AMS Website for Accred Certificates and CA Reports. Are they in a Settlement?

Just for awareness. Thanks

Respectfully,

John A. Reid

Program/Operations Analyst
USDA | National Organic Program
1400 Independence Avenue SW | 2649-S | Washington DC 20250

Main: (202) 260-9452 | Cell: (b) (6)
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 <Renee.Mann@ams.usda.gov>
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 <Cheri.Courtney@ams.usda.gov>
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 <Cheri.Courtney@ams.usda.gov>
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!
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 <Cheri.Courtney@ams.usda.gov>
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
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 <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>  
**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

Ok thanks.

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

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

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

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

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

That is great news Tammy!

Cheri

Tammie

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
Hi Renee-

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. **(b) (5)**

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 <Paul.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>
Cc: **(b) (8)**
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 90 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: (6) 
Twitter: @NationalOrganic
Facebook: Facebook.com/NationalOrganicCoalition
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

Click here to send a Registered Email® message to anyone.
NOTICE OF NONCOMPLIANCE

MAY 13 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 NP922HZZA.NC1-NC5, NC7-NC20) were cleared and determined to be implemented and effective. One noncompliance, NP922ZZA.NC6, was withdrawn.

One noncompliance, NP922ZZA.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 AIAnbox@ams.usda.gov 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.
If you have questions regarding this notice, please contact your Accreditation Manager, Robert Yang, at (202) 690-4540 or RobertH.Yang@ams.usda.gov.

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

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>ETKO – Ecological Farming Control Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Address</td>
<td>160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey</td>
</tr>
<tr>
<td>Mailing Address</td>
<td>160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey</td>
</tr>
<tr>
<td>Contact &amp; Title</td>
<td>Dr. Mustafa Akyuz General and QMS Manager</td>
</tr>
<tr>
<td>E-mail Address</td>
<td><a href="mailto:ma@etko.org">ma@etko.org</a></td>
</tr>
<tr>
<td>Phone Number</td>
<td>+90-232-3397606</td>
</tr>
<tr>
<td>Reviewer &amp; Auditor</td>
<td>Penny Zuck, NOP Reviewer; Lars Crail, On-site Auditor.</td>
</tr>
<tr>
<td>Program</td>
<td>USDA National Organic Program (NOP)</td>
</tr>
<tr>
<td>Review &amp; Audit Dates</td>
<td>NOP assessment review: April 29, 2015</td>
</tr>
<tr>
<td></td>
<td>Onsite audit: May 12-16, 2014</td>
</tr>
<tr>
<td>Audit Identifier</td>
<td>NP4132LCA</td>
</tr>
<tr>
<td>Action Required</td>
<td>Yes</td>
</tr>
<tr>
<td>Audit &amp; Review Type</td>
<td>Renewal Assessment</td>
</tr>
<tr>
<td>Audit Objective</td>
<td>To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ETKO’s certification program.</td>
</tr>
<tr>
<td>Audit &amp; Determination Criteria</td>
<td>7 CFR Part 205, National Organic Program as amended</td>
</tr>
<tr>
<td>Audit &amp; Review Scope</td>
<td>ETKO’s certification services in carrying out the audit criteria for Crops, Wild Crops, and Handling.</td>
</tr>
</tbody>
</table>

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.

**NP719900A.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.
NP805000A.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 non-compliance 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
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 re-applied. 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.”

**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.”

**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…”

**Corrective Action:** The wild crop witness inspection operation did not have maps or description designating the harvest area or identifying the buffer zones.

NP4132LCA NC ETKO 05/08/2015  Page 9 of 16
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 §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.
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
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)
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
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
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: 1
  NC number(s): 15.1

- Outstanding noncompliance: None
  NC number(s):
### Notification of Resolution of Noncompliance

**Noncompliance No:** 1  
**Major** ☒  
**Minor** ☐  
**Inspection Date:** 07.12.2015

<table>
<thead>
<tr>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>02.04.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

**Noncompliance:**

$205.307$ 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).”

- 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.

- 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.

- Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer. Provided, that, the shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and: Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.

**A8.1:** No labelling is done for bulk transports. But they did not mark organic storages as ORGANIC and also crops in storage are not indicated and have no labels.

**B2.2:** There is no indication on the storages

**B2.5:** No labels are used for bulk products.

### Inspection criteria

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref.</th>
<th>205.307a</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
</table>

| 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 |

**Action taken:** Labels are prepared. Storages are indicated as organic (see pictures). Crops are sold as conventional but sample of label is prepared. Bulk products will be indicated as organic.

Please identify the supporting documents, if any: Annex 1; storage pictures. In case organic trading.

**Name, Surname and Signature of Appl. Resp.:** Roman Vysochin  
**Date:** 30.04.2016

**Review Date:** 02.06.2016  
**Resolved** ☒  
**Unresolved** ☐

**Review Comment:** Labels draft was prepared and send to etko for approval. They put indication to the storage as “Organic” Pictures attached. Operator declared that products from 2015 crops sold as conventional, no organic product remained in storages.

**Reviewer name & signature:** Mustafa Akyüz
Dear Madam / Sir: Roman Vysochin  

Date: 06.06.2016

On the date 07.12.2015 ETKO Inspector [b], [b], (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) :  
**Notification of Resolution of Noncompliance**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minör</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>☒</td>
<td></td>
<td>07.12.2015</td>
<td>02.04.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

**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.

**They have no records about cleaning of storages and trucks.**

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.272 (a),</th>
<th>ETKO rules ref.</th>
<th>889-Article 31</th>
<th>IACB 7.5.2</th>
<th>OCP 11.4, 15.1 and 2:</th>
</tr>
</thead>
</table>

**Action taken:** Records of storage and trucks cleaning are presented.

Please identify the supporting documents, if any: Annexes of records

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roman Vysochin</td>
<td>30.04.2016</td>
</tr>
</tbody>
</table>

**Review Date:** 02.06.2016

Resolved ☒ Unresolved ☐

**Review Comment:** Records of storage cleaning were provided see Annex 4 and also Transport cleaning register form was prepared for future trade activities. No organic trade was realized in 2015.

**Reviewer name & signature:** Mustafa Akyüz
# Notification of Resolution of Noncompliance

**Noncompliance No:** 2  
**Major:** ☐  
**Minor:** ☒  
**Inspection Date:** 07.12.2015  
**Date of Notification:** 02.04.2016  
**Due Date:** 02.05.2016

**Noncompliance:**

- §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 container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer. Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and:
    - Provided further,That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.

There are no labels on the storages and stored crops are not marked.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.307 (a)</th>
<th>ETKO rules ref.</th>
<th>889-Article 35 IACB 7.5.4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken</td>
<td>Labels are prepared. Storages are indicated as organic (see pictures). Crops are sold as conventional but sample of label is prepared.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any:  

**Name, Surname and Signature of Appl. Resp.:** Roman Vysochin  
**Date:** 30.04.2016

**Review Date:** 02.06.2016  
**Resolved:** ☒  
**Unresolved:** ☐

**Review Comment:** Confirmed label are prepared. Storages are marked with “Organic”.

**Reviewer name & signature:** Mustafa Akyüz
## Notification of Resolution of Noncompliance

### 31300-01 AGROS

**Noncompliance No:** 3  
**Major** ☒  
**Minor** ☐  
**Inspection Date:** 07.12.2015

**Date of Notification:** 02.04.2016  
**Due Date:** 02.05.2016

### 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:
  1. Have been managed in accordance with the provisions of §§205.203 through 205.206;  
  2. 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  
  3. 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 enough description about buffer zones and farm neighbors. Buffer zones on the fields map are not clearly indicated.

### Inspection criteria

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>205.202 (c)</th>
<th>ETKO rules ref.</th>
<th>6.5.3 - 834-Article 12.1</th>
</tr>
</thead>
</table>

### Action taken

Maps are prepared.

Please identify the supporting documents, if any: Annex 2

### Name, Surname and Signature of Appl. Resp.

Roman Vysochin  
**Date:** 30.04.2016

### Review Date

**Date:** 02.06.2016  
**Resolved** ☒  
**Unresolved** ☐

### Review Comment

Maps were updated and provided to ETKO Annex 2. Evaluation of BZ is done and indications made on the map.

### Reviewer name & signature:
# Notification of Resolution of Noncompliance

**31300-01 AGROS**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minör</th>
<th>Inspection Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td></td>
<td>✗</td>
<td>07.12.2015</td>
</tr>
</tbody>
</table>

**Date of Notification:** 02.04.2016  
**Due Date:** 02.05.2016

**Noncompliance:**

205.403 (c) Verification of information. 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, 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.

There are no records about trainings personal in organic farming and NOP regulation was not present in the farm.

**Inspection criteria**  
**NOP reg. ref.** 205.403c1  
**ETKO rules ref.** 889-Article 31  
**IACB 7.5.2**

**Action taken:** NOP regulations were downloaded from USDA AMS webpage. Trainings were done and registers are prepared.

**Please identify the supporting documents, if any:** Annexes

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roman Vysochin</td>
<td>30.04.2016</td>
</tr>
</tbody>
</table>

**Review Date:** 02.06.2016  
**Resolved** ✗  
**Unresolved**

**Review Comment:** NOP regulations are in electronic format in farm. Training registers are presented, but date of training not mentioned, dates to be mentioned for future trainings.

**Reviewer name & signature:** Mustafa Akyüz
Notification of Resolution of Noncompliance
31300-01 AGROS

Noncompliance No 5

Date of Notification 02.04.2016
Due Date 02.05.2016

205.204 Seeds and planting stock practice standard.
(a) The producer must use organically grown seeds, annual seedlings, 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 variety is not commercially available: Except, That, organically produced seed must be used for the production 
of edible sprouts;
(2) Nonorganically produced seeds and planting stock that have been treated with a substance included on the National List of 
synthetic substances allowed for use in organic crop production may be used to produce an organic crop when an equivalent 
organically produced or untreated variety is not commercially available;
(3) Nonorganically produced annual seedlings may be used to produce an organic crop when a temporary variance has been granted 
in accordance with §205.290(a)(2);
(4) Nonorganically produced planting stock to be used to produce a perennial crop may be sold, labeled, or represented as 
organically produced only after the planting stock has been maintained under a system of organic management for a period of no 
less than 1 year; and
(b) [Reserved]

16.4 There is risk of GMO contamination in Ukraine. Producer did not provide Vendor Declaration for corn.

Inspection criteria NOP reg. ref 205.204 ETKO rules ref 834-Article 9, IACB 5.9, 16.4

Action taken Vendor declaration for corn is prepared. There were used GMO-free seeds.

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp. Roman Vysochin Date 30.04.2016

Review Date 02.06.2016
Resolved ☑
Unresolved □

Review Comment: The Vendor declaration for corn was provided to ETKO.

Reviewer name & signature: Mustafa Akyüz
Subject: Minor Issues

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.


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.

<table>
<thead>
<tr>
<th>Issue 1: 6.5</th>
<th>Toprak iyileştirme ve koruma planınız var mı ve tatmin edici mi? LÜTFEN TOPRAK İYİLEŞTİRME VE KORUMA PLANINIZI AçIKLAYINIZ.</th>
</tr>
</thead>
</table>

Fatih Aksoy
Dear Madam / Sir: **Arif Gürdal**

Date: **29.07.2016**

On the dates **20.07.2016** ETKO Inspector 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  NOPACAAverseActions@ams.usda.gov
**Notification of Noncompliance**

**Noncompliance:**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.1</td>
<td></td>
<td></td>
<td>20.07.2016</td>
</tr>
</tbody>
</table>

**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 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:

1. Raw animal manure, which must be composted unless it is:
   (i) Applied to land used for a crop not intended for human consumption;
   (ii) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or
   (iii) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;

2. Composted plant and animal materials produced though a process that:
   (i) Established an initial C:N ratio of between 25:1 and 40:1; and
   (ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or
   (iii) Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.


Composting techniques appropriate but there is no recording of C:N ratio, heat and turning

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.203c2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Action taken:**

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Arif Gürdal</th>
<th>Date</th>
<th>27.07.2016</th>
</tr>
</thead>
</table>

**Review Date**  
Resolved □  
Unresolved □

**Review Comment:**

Reviewer name & signature:
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.

Saygılarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

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

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
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
  NC number(s) :
### Resolved Noncompliance Notification

**Noncompliance No:** 16.1
**Major** ☒  **Minor** ☐
**Inspection Date:** 20.07.2016

**Date of Notification:** 12.08.2016  
**Due Date:** 12.09.2016

#### 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 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:

1. Raw animal manure, which must be composted unless it is:
   - (i) Applied to land used for a crop not intended for human consumption;
   - (ii) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or
   - (iii) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;

2. Composted plant and animal materials produced through a process that:
   - (i) Established an initial C:N ratio of between 25:1 and 40:1; and
   - (ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or
   - (iii) Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.


#### 4.1 Composting techniques are appropriate but there is no record system for C:N ratio, temperature and mixing the compost.

**Inspection criteria**

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>205.203(c)(2)</th>
<th>ETKO rules ref.</th>
<th>205.203(c)(2)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Action taken:</strong></td>
<td>The record systems regarding C:N ratio, temperature and mixing are developed as indicated in Annex-1 with a declaration.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any: **Annex-1 Record System of Composting**

**Name, Surname and Signature of Appl. Resp.:** Arif Gürdal  
**Date:**

**Review Date:** 11.08.2016  
**Resolved** ☒  **Unresolved** ☐

**Review Comment:** **Annex-1 Record System of Composting is checked. The temperatures and the frequency of mixing the compost are provided in the Table of Compost Measuring. And the C:N ratio values are indicated in the Table of Physical & Chemical Properties of Manure and in the Table 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 & signature:** Fatih Aksoy
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 NOPACAAdverseActions@ams.usda.gov
## Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
<th>Location - Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3214</td>
<td>Belagro</td>
<td>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</td>
</tr>
</tbody>
</table>

**Initial Inspection** [ ] **Surveillance Inspection** [x] **Report no** 3214-2016.ma

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Record Keeping</th>
<th>Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>06.10.2016</td>
<td>Due Date</td>
<td>17.11.2016</td>
</tr>
<tr>
<td>Date of Notification</td>
<td>17.10.2016</td>
<td>[x] Major</td>
<td>Minor M1-9.6</td>
</tr>
<tr>
<td>Factors causing risk on the product</td>
<td></td>
<td>Factors causing no risk on the condition of the product.</td>
<td></td>
</tr>
<tr>
<td>Use of inputs which are not allowed by the regulations</td>
<td></td>
<td>Production process plan partly implemented.</td>
<td></td>
</tr>
<tr>
<td>Non-Organic product sales as organic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirements of regulation or standard not applied</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frequent minor non-conformities on the same requirement of regulation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Misuse of the licenses and certificates</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production process plan not implemented</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 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:** - Lot nr is not mentioned with B/L and Invoice. - Status of product is not mentioned with B/L

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Operator name and signature</th>
<th>Corrective Action Plan by Operator</th>
</tr>
</thead>
<tbody>
<tr>
<td>[b] (b) (b) (c)</td>
<td>Vyacheslav Belov</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Vyacheslav Belov</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17.11.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

**Accepted:** [x] **NO** [ ] **Date** [ ] **ETKO approval** [ ]

**Explanations**
Notification of Noncompliance

3214 Belagro

Operator unit no. 3214  Unit name Belagro
Location - Address 2, Lisova str., Brovary city, Kiev region, 07400, Ukraine

Initial Inspection  □  Surveillance Inspection  ✔  Report no 3214-2016.ma

Subject of nonconformity  Labelling  Std or reg. Art. nr. IACB 7.5.2, NOP 205.307  NCR No 2016.2

Inspection Date  06.10.2016  Date of Notification  17.10.2016  Due Date  17.11.2016

☑ Major M2-9.2  □ Minor
☐ Factors causing risk on the product  ☐ Factors causing no risk on the condition of the product.
☐ Use of inputs which are not allowed by the regulations.  ☐ Production process plan partly implemented.
☐ Non-Organic product sales as organic.
☐ Requirements of regulation or standard not applied
☐ Frequent minor non-conformities on the same requirement of regulation.
☐ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
☐ Misuse of the licenses and certificates
☐ Production process plan not implemented.

Description of Nonconformity by Inspector

§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.

Issues: - Label approved after the export, so product transported to US without label

Inspector Name and signature  Vyacheslav Belov
Operator name and signature  Vyacheslav Belov

Corrective Action Plan by Operator

Target date  17.11.2016  Operator name and signature  Vyacheslav Belov  Actual Completion date

Verification of Operator’s corrective action and implementation by ETKO

Accepted:  YES  □  NO  □  Date  ETKO approval

Explanations:
### Notification of Noncompliance

**3214 Belagro**

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3214</th>
<th>Unit name</th>
<th>Belagro</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location - Address</td>
<td>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Initial Inspection**
- **Surveillance Inspection**
- **Report no 3214-2016.ma**

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Prohibited substances</th>
<th>Std or reg. Art. nr. IACB 5.3b,c, 7.2.4a, NOP 205.105.a</th>
<th>NCR No 2016.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>06.10.2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>14.10.2016</td>
<td>Due Date</td>
<td>14.11.2016</td>
</tr>
<tr>
<td>Major</td>
<td></td>
<td>Minor M1-8.11</td>
<td></td>
</tr>
<tr>
<td>Factors causing risk on the product</td>
<td></td>
<td>Factors causing no risk on the condition of the product.</td>
<td></td>
</tr>
<tr>
<td>Use of inputs which are not allowed by the regulations.</td>
<td>Production process plan partly implemented.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Organic product sales as organic.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirements of regulation or standard not applied</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frequent minor non-conformities on the same requirement of regulation.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Misuse of the licenses and certificates</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production process plan not implemented.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 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:** - TLR Results show 87 substances and NOP 2611.1 Prohibited substances indicates 191 substances so there is big gap of chemicals screened. 104

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Vyacheslav Belov</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>205.105</td>
</tr>
</tbody>
</table>

### Corrective Action Plan by Operator

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Vyacheslav Belov</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17.11.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Verification of Operator’s corrective action and implementation by ETKO

<table>
<thead>
<tr>
<th>Accepted</th>
<th>Date</th>
<th>ETKO approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>YES</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Explanations:**
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 Ekolajik 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Vyacheslav Belov  


On the dates (06.10.2016) ETKO Inspector Mr. [redacted] 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**

<table>
<thead>
<tr>
<th>Resolved Non-compliances:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator unit no.</td>
<td>3214</td>
</tr>
<tr>
<td>Unit name</td>
<td>Belagro</td>
</tr>
<tr>
<td>Location - Address</td>
<td>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</td>
</tr>
</tbody>
</table>

**Initial Inspection** ☑   **Surveillance Inspection** ☑   **Report no 3214-2016.m3**

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Record Keeping</th>
<th>Std or reg. Art. nr.</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>06.10.2016</td>
<td>IACB7.5.2.1d, NOP 205.103b2</td>
<td>NCR No 2016.1</td>
</tr>
<tr>
<td>Date of Notification</td>
<td>17.10.2016</td>
<td>Due Date</td>
<td>17.11.2016</td>
</tr>
<tr>
<td>Major</td>
<td>☑ ☑ Minor M1-9.6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Factors causing risk on the product
- Use of inputs which are not allowed by the regulations.
- Non-Organic product sales as organic.
- Requirements of regulation or standard not applied
- Frequent minor non-conformities on the same requirement of regulation.
- Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates.
- Production process plan partly implemented.

### 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**: Lot nr is not mentioned with B/L and invoice. - Status of product is not mentioned with B/I

**Inspector Name and signature**: Vyacheslav Belov

**Operator name and signature**: Vyacheslav Belov

### Corrective Action Plan by Operator

We are aware of the issue and we guarantee compliance of 205.103b. We will prepare trade documents and labels including Status of the product and the lot number clearly. We created instructions for transport of goods in Ukraine and out of Ukraine, where it is mentioned that without reference for status of the product in all documents – not allowed to transport organic products. Instruction is attached.

<table>
<thead>
<tr>
<th>Target date</th>
<th>17.11.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Vyacheslav Belov</td>
</tr>
</tbody>
</table>

### Verification of Operator’s corrective action and implementation by ETOKO

**Date**: 21.12.2016

**ETKO approval**: Fatih Aksoy

**Accepted**: YES ☑   **NO** ☑
## Notification of Resolution of Noncompliance

**3214D-01 Belagro**

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3214</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit name</td>
<td>Belagro</td>
</tr>
<tr>
<td>Location - Address</td>
<td>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</td>
</tr>
</tbody>
</table>

### Initial Inspection  
Surveillance Inspection  
Report no 3214-2016.ma

### Subject of nonconformity

<table>
<thead>
<tr>
<th>Labelling</th>
<th>Std or reg. Art. nr. IAC87.5.2, NOP 205.307</th>
<th>NCR No 2016.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>06.10.2016</td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>17.10.2016</td>
<td>Due Date</td>
</tr>
<tr>
<td>Major M2-9.2</td>
<td></td>
<td>Minor</td>
</tr>
<tr>
<td>□ Factors causing risk on the product</td>
<td>□ Factors causing no risk on the condition of the product.</td>
<td></td>
</tr>
<tr>
<td>□ Use of inputs which are not allowed by the regulations.</td>
<td>□ Production process plan partly implemented.</td>
<td></td>
</tr>
<tr>
<td>□ Non-Organic product sales as organic.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Requirements of regulation or standard not applied</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Frequent minor non-conformities on the same requirement of regulation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Misuse of the licenses and certificates</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Production process plan not implemented.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 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(i)i)."

(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.

Issues: Label approved after the export, so product transported to US without label

### Inspector Name and signature

Vyacheslav Belov

### Corrective Action Plan by Operator

From now never products will be transported without label. Please find attached our declaration. Instruction for transporting does not allow to transport any organic products without labels and referring to the status.


### Verification of Operator’s corrective action and implementation by ETKO

Accepted: **YES**  
Date: **21.12.2016**  
ETKO approval: Fatih Aksoy

Explanations: Declaration provided, satisfactory Annex 3 Instruction for transport
# Notification of Resolution of Noncompliance

**3214D-01 Belagro**

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3214</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit name</td>
<td>Belagro</td>
</tr>
<tr>
<td>Location - Address</td>
<td>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>□</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surveillance Inspection</td>
<td>☑</td>
</tr>
<tr>
<td>Report no</td>
<td>3214-2016.ma</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Prohibited substances</th>
<th>Std or reg. Art. nr. IACB</th>
<th>NCR No 2016.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>06.10.2016</td>
<td>5.3b,c, 7.2.4a, NOP 205.105.a</td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>14.10.2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Due Date</td>
<td>14.11.2016</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description of Nonconformity by Inspector</th>
</tr>
</thead>
<tbody>
<tr>
<td>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.</td>
</tr>
<tr>
<td>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:</td>
</tr>
<tr>
<td>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</td>
</tr>
<tr>
<td>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</td>
</tr>
<tr>
<td>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</td>
</tr>
<tr>
<td>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</td>
</tr>
<tr>
<td>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</td>
</tr>
<tr>
<td>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</td>
</tr>
<tr>
<td>(g) Sewage sludge.</td>
</tr>
</tbody>
</table>

**Issues:** - TLR Results show 87 substances and NOP 2611.1 Prohibited substances includes 191 substances so there is big gap of chemicals screened. 104

**Inspector Name and signature:** Vyacheslav Belov

**Corrective Action Plan by Operator**

We will follow NOP 2611.1 Prohibited substances list and make sure that all substances are covered

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Vyacheslav Belov</th>
<th>Actual Completion date</th>
</tr>
</thead>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>Date</th>
<th>ETKO approval</th>
<th>Fatih Aksoy</th>
</tr>
</thead>
</table>

**Explanations:** Declaration provided, satisfactory, however when analyses done the reports will be verified for compliance. Annex 4 Declaration labelling & analyses
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
Dear Madam / Sir: Okunenko Igor Nicolaevich

Date: 26.09.2016

On the dates 04.08.2016 ETKO Inspector [b] (b), (6) (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.

<table>
<thead>
<tr>
<th>Report no</th>
<th>Product Name</th>
<th>Operator</th>
<th>Store-Land</th>
<th>Substances</th>
<th>Residue (mg/kg)</th>
<th>EPA Tolerance</th>
<th>5% of EPA Tolerance</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016-20361</td>
<td>Sunflower Plants</td>
<td>3080F-01 Rinagro</td>
<td>Field No</td>
<td>Chlormequat</td>
<td>0.013</td>
<td>None</td>
<td>0.01</td>
<td>Noncompliance</td>
</tr>
<tr>
<td>2016-20360</td>
<td>Soybean Plants</td>
<td>3080F-01 Rinagro</td>
<td>Field No</td>
<td>Chlormequat</td>
<td>0.139</td>
<td>None</td>
<td>0.01</td>
<td>Noncompliance</td>
</tr>
</tbody>
</table>

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 – Izmir/TURKEY
T+90-232-3397606 or by email at: ma@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAverseActions@ams.usda.gov
Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

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.

Action taken

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
<th>Review Date</th>
<th>Review Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Okunenko Igor Nicolaevich</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reviewer name & signature:
Dear Madam / Sir: Ferens Vasilii Ivanovich  

Date: 26.09.2016

On the dates 05.08.2016 ETKO Inspector [b] (b), (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.

<table>
<thead>
<tr>
<th>Report no</th>
<th>Product Name</th>
<th>Operator</th>
<th>Store-Land</th>
<th>Substances</th>
<th>Residue (mg/kg)</th>
<th>EPA Tolerance</th>
<th>5% of EPA Tolerance</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>51610020</td>
<td>Barley seeds</td>
<td>3080F-02 Diana</td>
<td>Field No</td>
<td>Chlorpyrifos</td>
<td>0.04</td>
<td>None</td>
<td>0.01</td>
<td>Noncompliance</td>
</tr>
</tbody>
</table>

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
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.

Action taken

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp. | Ferens Vasily Ivanovich | Date
--- | --- | ---
Review Date |  | Resolved ☐ Unresolved ☐
Review Comment:

Reviewer name & signature:
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.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

Saygılarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekoloj 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Aytekin METE

On the dates (19.07.2016) ETKO Inspector Mr./ Mrs. realized an application review / initial / continuing / recertification / surveillance inspection to your operation. The objective of (the review was to ensure the completeness of your application) / inspection was to determine the your organic operation’s compliance against the regulation(s):

**USDA National Organic Program**

Based on the application review findings / inspection report dated...19.07.2016..., 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.....30.08.2016................. (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. Fatih AKSOY from ETKO +90-232-3397606 or by email at:
fa@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAverseActions@ams.usda.gov
Noncompliance:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.1</td>
<td>☑</td>
<td></td>
<td>19.07.2016</td>
<td>01.08.2016</td>
<td>30.08.2016</td>
</tr>
</tbody>
</table>

**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.

**205.103.a.b.c** The producer couldn’t submit the records related to purchase and sale and, the harvest quantities during the inspection. The records upon how much and which type of products were harvested providing the dates and their buyers aren’t present on their files.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.103.a.b.c</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any:

**Name, Surname and Signature of Appl. Resp.**

<table>
<thead>
<tr>
<th>Review Date</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Resolved [ ]

Unresolved [ ]

**Review Comment:**

**Reviewer name & signature:**
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.

205.202.c Some neighbourhood conventional parcels have been found in only two areas of the producer’s fields. There is no Buffer Zone indication on the maps of these two areas.
Dear Madam / Sir: Aytekin METE

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) :
Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.1</td>
<td>✔</td>
<td>☐</td>
<td>19.07.2016</td>
<td>01.08.2016</td>
<td>30.08.2016</td>
</tr>
</tbody>
</table>

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,” 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.

205.103.a.b.c The producer couldn’t submit the records related to purchase and sale and, the harvest quantities during the inspection. The records upon how much and which type of products were harvested providing the dates and their buyers aren’t present on their files.

Action taken

See attachment for harvest and selling records.

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp.: Aytekin METE
Date: 29.08.2016

Review Date: 29.08.2016
Resolved ☒ Unresolved ☐

Review Comment:
Harvest and selling records were provided to ETKO, (see annex NC 1)

Reviewer name & signature: Mustafa AKYÜZ
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.

205.202.c  Some neighborhood conventional parcels have been found in only two areas of the producer’s fields. There is no Buffer Zone indication on the maps of these two areas.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.202.c</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See attached maps

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aytekin METE</td>
<td>29.08.2016</td>
</tr>
</tbody>
</table>

Review Date | 29.08.2016 | Resolved ☒ | Unresolved ☐

Review Comment:

Mentioned parcels maps were provided to ETKO. Buffer zones are indicated on maps. (See annex NC 2)

Reviewer name & signature: Mustafa AKYÜZ
Dear Madam / Sir: Alexey Khachkovskiy

Date: 20.12.2016

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, 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  NOPACAAverseActions@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) :
### Notification of Noncompliance

**3141D-01 Ekolium**

<table>
<thead>
<tr>
<th>Date</th>
<th>15.07.2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rev</td>
<td>00</td>
</tr>
<tr>
<td>Page</td>
<td>2/3</td>
</tr>
</tbody>
</table>

#### Outstanding Noncompliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3141</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit name</td>
<td>Ekolium</td>
</tr>
<tr>
<td>Location - Address</td>
<td>9, Boryspilska Str, Kiev, 02099, Ukraine</td>
</tr>
</tbody>
</table>

- **Initial Inspection**
- **Surveillance Inspection**

**Report no** 3141-2016.fa

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Record Keeping</th>
<th>Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2</th>
<th>NCR No</th>
<th>2016.1</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>07.10.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>17.10.2016</td>
</tr>
<tr>
<td>Due Date</td>
<td>17.11.2016</td>
</tr>
</tbody>
</table>

- **□ Major**
- **Minor M1-9.6**

<table>
<thead>
<tr>
<th>Factors causing risk on the product</th>
<th>Factors causing no risk on the condition of the product.</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Use of inputs which are not allowed by the regulations.</td>
<td>□ Production process plan partly implemented.</td>
</tr>
<tr>
<td>□ Non-Organic product sales as organic.</td>
<td></td>
</tr>
<tr>
<td>□ Requirements of regulation or standard not applied</td>
<td></td>
</tr>
<tr>
<td>□ Frequent minor non-conformities on the same requirement of regulation.</td>
<td></td>
</tr>
<tr>
<td>□ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.</td>
<td></td>
</tr>
<tr>
<td>□ Misuse of the licenses and certificates</td>
<td></td>
</tr>
<tr>
<td>□ Production process plan not implemented.</td>
<td></td>
</tr>
</tbody>
</table>

#### 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)

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Alexey Khackovskiy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Alexey Khackovskiy</td>
</tr>
</tbody>
</table>

**Corrective Action Plan by Operator**

We are aware of the issue and we guarantee compliance of 205.103b. We will prepare trade documents and labels including status of the product and the lot number clearly from now on.

<table>
<thead>
<tr>
<th>Target date</th>
<th>17.11.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Alexey Khackovskiy</td>
</tr>
<tr>
<td>Actual Completion date</td>
<td>12.12.2016</td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted:</th>
<th>YES</th>
<th>NO</th>
<th>Date</th>
<th>19.12.2016</th>
<th>ETKO approval</th>
<th>Mustafa AKYÜZ</th>
</tr>
</thead>
</table>

**Explanations:** We accept their Declaration and will monitor their future trade documents and labels particularly for this issue. (See Annex 1 and 2)
### Notification of Noncompliance

**3141D-01 Ekolium**

<table>
<thead>
<tr>
<th>NR</th>
<th>GP 18 F 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>15.07.2015</td>
</tr>
<tr>
<td>Rev</td>
<td>00</td>
</tr>
<tr>
<td>Page</td>
<td>3/3</td>
</tr>
</tbody>
</table>

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

**Initial Inspection** □  
**Surveillance Inspection** ■  
**Report no** 3141-2016.fa

**Subject of nonconformity**  
**Labelling**

**Inspection Date** 07.10.2016  
**Date of Notification** 17.10.2016  
**Due Date** 17.11.2016

- Major M2-9.2
- Minor

- □ Factors causing risk on the product  
- □ Use of inputs which are not allowed by the regulations.
- □ Non-Organic product sales as organic.
- □ Requirements of regulation or standard not applied
- □ Frequent minor non-conformities on the same requirement of regulation.
- □ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- □ Misuse of the licenses and certificates
- □ Production process plan not implemented.

### Description of Nonconformity by Inspector

§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.

**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** Alexey Khackovskiy  
**Operator name and signature** Alexey Khackovskiy

### Corrective Action Plan by Operator

Please find attached declaration. We prepared instruction and from now labels with correct information will be used. Instruction for transportation was created. Please find it attached.

**Target date** 17.11.2016  
**Operator name and signature** Alexey Khackovskiy  
**Actual Completion date** 12.12.2016

### Verification of Operator’s corrective action and implementation by ETKO

**Accepted:** YES ■ NO □  
**Date** 19.12.2016  
**ETKO approval** Mustafa AKYÜZ

**Explanations:** They formed an instruction for transporting the goods with status “organic” where all the requirements described and sent this instruction to their suppliers. (See Annex 1 and 2)
Dear Madam / Sir: Alexey Khachkovskiy  

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 noncompliance’s in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

ETKO  
160 Sok. 13/3  35100 Bornova – Izmir/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 NOPACAAverseActions@ams.usda.gov
Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3141</th>
<th>Unit name</th>
<th>Ekolium</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location - Address</td>
<td>9, Boryspilska Str, Kiev, 02099, Ukraine</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Subject of nonconformity | Record Keeping | Std or reg. Art. nr. | NCR No | 2016.1
--- | --- | --- | --- |
| Inspection Date | 07.10.2016 |
| Date of Notification | 14.10.2016 |
| Due Date | 14.11.2016 |
| Major | Minor 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 sales as organic. | |
| Requirements of regulation or standard not applied | |
| Frequent minor non-conformities on the same requirement of regulation. | |
| Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available. | |
| Misuse of the licenses and certificates | |
| Production process plan not implemented. | |

**Description of Nonconformity by Inspector**

§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)

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Alexey Khackovskiy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Alexey Khackovskiy</td>
</tr>
</tbody>
</table>

**Corrective Action Plan by Operator**

<table>
<thead>
<tr>
<th>Target date</th>
<th>14.11.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Alexey Khackovskiy</td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ETKO approval</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Notification of Noncompliance**

**3141D-01 Ekolium**

<table>
<thead>
<tr>
<th>Nr</th>
<th>GP 18 F 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>15.07.2015</td>
</tr>
<tr>
<td>Rev</td>
<td>00</td>
</tr>
<tr>
<td>Page</td>
<td>3/3</td>
</tr>
</tbody>
</table>

**Explanations**

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

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>Surveillance Inspection</th>
<th>Report no 3141-2016.fa</th>
</tr>
</thead>
</table>

**Subject of nonconformity**  
**Labelling**

<table>
<thead>
<tr>
<th>Std or reg. Art. nr.</th>
<th>IACB7.5.2, NOP 205.307</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCR No</td>
<td>2016.2</td>
</tr>
</tbody>
</table>

| Inspection Date | 07.10.2016 |
| Date of Notification | 14.10.2016 |
| Due Date | 14.11.2016 |

**Factors causing risk on the product**  
Factors causing no risk on the condition of the product.

**Non-Organic product sales as organic.**

**Requirements of regulation or standard not applied**

Frequent minor non-conformities on the same requirement of regulation.

Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.

Misuse of the licenses and certificates

Production process plan not implemented.

**Description of Nonconformity by Inspector**

§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.

**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** Alexey Khackovskiy

**Operator name and signature** Alexey Khackovskiy

**Corrective Action Plan by Operator**

| Target date | 14.11.2016 |
| Operator name and signature | Alexey Khackovskiy |
| Actual Completion date | |

**Verification of Operator’s corrective action and implementation by ETKO**

| Accepted | YES | NO |
| Date |  | ETKO approval |

**Explanations:**
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.

Saygılarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

Please help to save the planet and only print this email if you really need to. Thank you.
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: ma@etko.org  info@etko.org  .

Sincerely

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

Cc: NOP appeals team  NOPACAAverseActions@ams.usda.gov
### Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
<th>Location - Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3216F-01</td>
<td>&quot;Helianthus&quot; Llc</td>
<td>1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>Surveillance Inspection</th>
<th>Report no</th>
<th>3216F-01.2016.ac</th>
</tr>
</thead>
</table>

#### Subject of nonconformity

- **Crop rotation (M1)**
  - Std or reg. Art. nr. COR 5.4.2, NOP 205.203b IACB 6.4.3.2
  - NCR No 2016.1

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>22.08.2016</td>
<td>30.08.2016</td>
<td>30.09.2016</td>
</tr>
</tbody>
</table>

- [ ] Major
- [X] Minor

- [ ] Factors causing risk on the product
- [X] Factors causing no risk on the condition of the product.
- [ ] Use of inputs which are not allowed by the regulations.
- [ ] Production process plan partly implemented.
- [ ] Non-Organic product sales as organic.
- [ ] Requirements of regulation or standard not applied
- [ ] Frequent minor non-conformities on the same requirement of regulation.
- [ ] Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- [ ] Misuse of the licenses and certificates
- [ ] Production process plan not implemented.

### Description of Nonconformity by Inspector

§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

**Issue:** Crop rotation is not include leguminous crops, green manure or other crops.

### Corrective Action Plan by Operator

Crop rotation for the next agriculture season will be developed, including green manure into the structure of arable fields.

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.09.2016</td>
<td>Iliin Dmitriy Ivanovich</td>
<td></td>
</tr>
</tbody>
</table>

### Verification of Operator’s corrective action and implementation by ETKO

- **Accepted:** YES [ ] NO [ ], Date [ ], ETKO approval
- **Explanations**
### Notification of Noncompliance

**3216F-01 Helianthus.Rev1**

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3216F-01</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit name</td>
<td>&quot;Helianthus&quot; Llc</td>
</tr>
<tr>
<td>Location - Address</td>
<td>1-A Kirov str., Pereshchepino city, Novomoskovsk distr.,Dnipropetrovsk reg., Ukraine 51220</td>
</tr>
<tr>
<td>Initial Inspection</td>
<td>Surveillance Inspection</td>
</tr>
<tr>
<td>Report no</td>
<td>3216F-01.2016.ac</td>
</tr>
</tbody>
</table>

**Subject of nonconformity**

- Risk of contamination (M2)
- Std or reg. Art. nr. NOP 205.103a,b,c, 205.201.5. IACB 6.3.1.ii, COR 5.1.5
- NCR No 2016.2

**Inspection Date** 22.08.2016

**Date of Notification** 30.08.2016

- Major
- Minor

<table>
<thead>
<tr>
<th>Factors causing risk on the product</th>
<th>Factors causing no risk on the condition of the product.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use of inputs which are not allowed by the regulations.</td>
<td>Production process plan partly implemented.</td>
</tr>
<tr>
<td>Non-Organic product sales as organic.</td>
<td></td>
</tr>
<tr>
<td>Requirements of regulation or standard not applied</td>
<td></td>
</tr>
<tr>
<td>Frequent minor non-conformities on the same requirement of regulation.</td>
<td></td>
</tr>
<tr>
<td>Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.</td>
<td></td>
</tr>
<tr>
<td>Misuse of the licenses and certificates</td>
<td></td>
</tr>
<tr>
<td>Production process plan not implemented.</td>
<td></td>
</tr>
</tbody>
</table>

**Description of Nonconformity by Inspector**

- §205.201 Organic production and handling system plan.
  - (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
- §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:** Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records..

**Issue:** Evidence of payment for the rent to the land owners, as they receive products from Helianthus management not provided.

**Inspector Name and signature**

<table>
<thead>
<tr>
<th>Operator name and signature</th>
<th>Iliin Dmitriy Ivanovich</th>
</tr>
</thead>
</table>

**Corrective Action Plan by Operator**

We use system when we cut crop around the fields before the main harvest and then put the crops (BZcrops-обкосы) to separate storage (or open place). We use the BZcrops (обкосы) for feed of own animal farm. 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.

<table>
<thead>
<tr>
<th>Target date</th>
<th>30.09.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator name and signature</td>
<td>Iliin Dmitriy Ivanovich</td>
</tr>
<tr>
<td>Actual Completion date</td>
<td></td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>YES</th>
<th>NO</th>
<th>Date</th>
<th>ETKO approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Explanations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Notification of Noncompliance

**3216F-01 Helianthus.Rev1**

- **Operator unit no.**: 3216F-01
- **Unit name**: "Helianthus" Llc
- **Location - Address**: 1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220
- **Initial Inspection**
  - Surveillance Inspection
  - Report no 3216F-01.2016.ac

### Subject of nonconformity

- **Risk of contamination (M2)**
- **Std or reg. Art. nr. NOP, IACB 4.2a, COR 1.2b**
- **NCR No 2016.3**

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>22.08.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>30.08.2016</td>
</tr>
<tr>
<td>Due Date</td>
<td>30.09.2016</td>
</tr>
</tbody>
</table>

- **Factors causing risk on the product**
- **Factors causing no risk on the condition of the product**
- **Use of inputs which are not allowed by the regulations.**
- **Production process plan partly implemented.**
- **Non-Organic product sales as organic.**
- **Requirements of regulation or standard not applied**
- **Frequent minor non-conformities on the same requirement of regulation.**
- **Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.**
- **Misuse of the licenses and certificates**
- **Production process plan not implemented.**

### Description of Nonconformity by Inspector

Organic production. A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.

**Issue**: Producers make a conservation and develop plan of the biodiversity in the farm.

**Inspector Name and signature**: Il'in Dmitriy Ivanovich

**Operator name and signature**: Iliin Dmitriy Ivanovich

### Corrective Action Plan by Operator

We will prepare and provide plan of the biodiversity in the farm.

**Target date**: 30.09.2016

**Verification of Operator’s corrective action and implementation by ETKO**

**Accepted**: YES

**Date**

**ETKO approval**

**Explanations**
Dear Madam / Sir: Zadorozhniy Vitaliy Mikhaylovich

Date: 30.08.2016

On the dates (23.08.2016) ETKO Inspector (b) (b), (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: ma@etko.org  info@etko.org  .

Sincerely

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

Cc: NOP appeals team  NOPACAAverseActions@ams.usda.gov
Non-compliances:

Operator unit no. | 3216F-03
---|---
Unit name | Zhytnitsa
Location - Address | 1-A, Tsentralna str., Karpivka vill., Shyrokiivsky distr., Dnipropetrovsk reg., Ukraine 53742

Initial Inspection | Surveillance Inspection
---|---
Report no | 3216F-03.2016.ac

Subject of nonconformity | Crop rotation (M1)
---|---
Std or reg. nr. | COR 5.4.2, NOP 205.203b IACB 6.4.3.2
NCR No | 2016.1

Inspection Date | 23.08.2016
Date of Notification | 30.08.2016
Due Date | 30.09.2016

□ Major
☑ Minor

☐ Factors causing risk on the product
☐ Factors causing no risk on the condition of the product.

☐ Use of inputs which are not allowed by the regulations.
☐ Production process plan partly implemented.

☐ Non-Organic product sales as organic.

☐ Requirements of regulation or standard not applied

☐ Frequent minor non-conformities on the same requirement of regulation.

☐ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.

☐ Misuse of the licenses and certificates

☑ Production process plan not implemented.

Description of Nonconformity by Inspector

§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

Issue: Crop rotation is not include leguminous crops, green manure or other crops.

Inspector Name and signature | Zadorozhniy Vitaliy
Operator name and signature | Mikhaylovich

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 | 30.09.2016
Operator name and signature | Zadorozhniy Vitaliy
Actual Completion date | Mikhaylovich

Verification of Operator’s corrective action and implementation by ETKO

Accepted: YES
NO
Date
ETKO approval

Explanations

(b)(6), (b)(7)(C)
### Notification of Noncompliance

**3216F-03 Zhytnitsa**

**Date** 15.07.2015  
**Rev** 0  
**Page** 3/4

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3216F-03</th>
<th>Unit name</th>
<th>Zhytnitsa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location - Address</td>
<td>1-A, Tsentralna str., Karpivka vill., Shyrokiivsly distr., Dnipropetrovsk reg., Ukraine 53742</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initial Inspection</td>
<td></td>
<td>Surveillance Inspection</td>
<td>x</td>
</tr>
</tbody>
</table>

### Subject of nonconformity

- **Risk of contamination (M2)**
- **Std or reg. Art. nr. NOP 205.103a,b,c, 205.201.5. IACB 6.3.1.ii, COR 5.1.5**
- **NCR No 2016.2**

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>23.08.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>30.08.2016</td>
</tr>
<tr>
<td>Due Date</td>
<td>30.09.2016</td>
</tr>
</tbody>
</table>

**Factors causing risk on the product**

- Factors causing no risk on the condition of the product.
- Use of inputs which are not allowed by the regulations.
- Production process plan partly implemented.
- Non-Organic product sales as organic.
- Requirements of regulation or standard not applied.
- Frequent minor non-conformities on the same requirement of regulation.
- Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates.
- Production process plan not implemented.

### Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(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.

§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:

- Be sufficient to demonstrate compliance with the Act and the regulations in this part.
- 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:** Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records.

**Issue:** Evidence of payment for the rent to the land owners, as they receive products from Zhytnitsa management not provided.

### Corrective Action Plan by Operator

We use system when we cut crop around the fields before the main harvest and then put the crops (BZcrops-обкосы) to separate storage (or open place). We use the BZcrops (обкосы) for conventional 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** 30.09.2016  
**Operator name and signature** Zadorozhnyi Vitaliy Mikhaylovich  
**Corrective Action Plan by Operator**

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>(b) (6), (b) (7)(C)</th>
<th>Operator name and signature</th>
<th>Zadorozhnyi Vitaliy Mikhaylovich</th>
</tr>
</thead>
</table>

### Verification of Operator’s corrective action and implementation by ETKO

**Accepted:** YES  
**Date**  
**ETKO approval**

**Explanations**
Notification of Noncompliance

3216F-03 Zhytnitsa.Rev1

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
<th>Zhytnitsa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location - Address</td>
<td>1-A, Tsentralna str., Karpivka vill., Shyrokiivskyi distr., Dnipropetrovsk reg., Ukraine 53742</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>Surveillance Inspection</th>
<th>Report no 3216F-03.2016.ac</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Risk of contamination (M2)</th>
<th>Std or reg. Art. nr. NOP, IACB 4.2a, COR 1.2b</th>
<th>NCR No 2016.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>23.08.2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>30.08.2016</td>
<td>Due Date</td>
<td>30.09.2016</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Major</th>
<th>Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Factors causing risk on the product</td>
<td>Factors causing no risk on the condition of the product.</td>
</tr>
<tr>
<td>Use of inputs which are not allowed by the regulations.</td>
<td>Production process plan partly implemented.</td>
</tr>
<tr>
<td>Non-Organic product sales as organic.</td>
<td></td>
</tr>
<tr>
<td>Requirements of regulation or standard not applied</td>
<td></td>
</tr>
<tr>
<td>Frequent minor non-conformities on the same requirement of regulation.</td>
<td></td>
</tr>
<tr>
<td>Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.</td>
<td></td>
</tr>
<tr>
<td>Misuse of the licenses and certificates</td>
<td></td>
</tr>
<tr>
<td>Production process plan not implemented.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description of Nonconformity by Inspector</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organic production. A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.</td>
</tr>
</tbody>
</table>

| Issue: Producers make a conservation and develop plan of the biodiversity in the farm. |

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Operator name and signature</th>
<th>Zadorozhniy Vitaliy Mikhaylovich</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Corrective Action Plan by Operator</th>
</tr>
</thead>
<tbody>
<tr>
<td>We will prepare and provide plan of the biodiversity in the farm.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Zadorozhniy Vitaliy Mikhaylovich</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.09.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Verification of Operator’s corrective action and implementation by ETKO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accepted: YES NO Date ETKO approval</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Explanations</th>
</tr>
</thead>
</table>
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.

Saygilarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Sir: Shin Dongyeop 

On the dates (11.04.2016) ETKO Inspector 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: ma@etko.org info@etko.org.

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAverseActions@ams.usda.gov
Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
</tr>
</thead>
</table>

Date of Notification: 30.06.2016  
Due Date: 30.07.2016

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,” “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 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.

There is no explanation regarding how to avoid organic production from contamination. Protecting measures of contamination haven’t been documented as the contamination protecting procedures in all the production activities.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>205.201(a)(5)</td>
<td>205.272(a)</td>
</tr>
</tbody>
</table>

Action taken

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp.: Shin Dongyeop  
Date

Review Date

Resolved ☐  Unresolved ☐

Review Comment:

Reviewer name & signature:
**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,” “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.

There is no explanation for inputs used as products, organic certificate, manufacturing process, product brochure etc. They use sodium hypochlorite and water for cleaning. Cleaning procedures and its records of irrigation aren’t attached. Sodium hypochlorite and water is used. Sodium hypochlorite products specification isn’t attached.

**Inspection criteria**

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>§205.201(a)</td>
<td>205.201.(a)</td>
<td>205.201.(a)</td>
</tr>
</tbody>
</table>

**Action taken**

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shin Dongyeop</td>
<td></td>
</tr>
</tbody>
</table>

**Review Date**

- Resolved [ ]
- Unresolved [ ]

**Review Comment:**

Reviewer name & signature:
Noncompliance No | 16.3 | Major ☒ | Minor ☐ | Inspection Date | 11.04.2016
---|---|---|---|---|---
Date of Notification | 30.06.2016 | Due Date | 30.07.2016

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 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 report and chlorine concentration aren't indicated.

| Inspection criteria | NOP reg. ref | 205.203 (c)(3) | ETKO rules ref. | 205.203 (c)(3) |
---|---|---|---|---|

Action taken

Please identify the supporting documents, if any:

| Name, Surname and Signature of Appl. Resp. | Shin Dongyeop | Date |
---|---|---|

Review Date

Resolved ☐

Unresolved ☐

Review Comment:

Reviewer name & signature:
(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
(3) Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
(d) Disease problems may be controlled through:
(1) Management practices which suppress the spread of disease organisms; or
(2) Application of nonsynthetic biological, botanical, or mineral inputs.

Pest, weed, and disease management program aren’t attached.
More details of neem oil aren’t attached such as products specification, organic certificate, manufacturing process, product brochure etc.
Disease management procedures haven’t been indicated by the producer.

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

Inspection criteria

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.206 (a)</td>
<td>205.206 (d)</td>
</tr>
</tbody>
</table>

Action taken

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp.: Shin Dongyeop

Review Date

Resolved [ ]

Unresolved [ ]

Review Comment:

Reviewer name & signature:
<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>16.5</th>
<th>Major ☒</th>
<th>Minor ☐</th>
<th>Inspection Date</th>
<th>11.04.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>30.06.2016</td>
<td></td>
<td></td>
<td>Due Date</td>
<td>30.07.2016</td>
</tr>
</tbody>
</table>

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 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.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.202 (c)</th>
<th>ETKO rules ref.</th>
<th>205.202 (c)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any:  

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Shin Dongyeop</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review Date</td>
<td></td>
<td>Resolved ☐</td>
</tr>
</tbody>
</table>

Review Comment:  

Reviewer name & signature:
**Noncompliance No**: 16.6  
**Date of Notification**: 30.06.2016  
**Due Date**: 30.07.2016

### 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,” “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;

**Farm Production Report is not taken and not attached yet.**

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
<th>Action taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.201 (a)(2)</td>
<td>205.201 (a)(2)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Review Date**

- Resolved □
- Unresolved □

**Review Comment:**

<table>
<thead>
<tr>
<th>Reviewer name &amp; signature:</th>
</tr>
</thead>
</table>

**Name, Surname and Signature of Appl. Resp.:** Shin Dongyeop

Date
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,” “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

Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

Inspection criteria

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.201(a)(5)</td>
<td>205.201(a)(5)</td>
</tr>
</tbody>
</table>

Action taken

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shin Dongyeop</td>
<td></td>
</tr>
</tbody>
</table>

Review Date

Resolved [ ]
Unresolved [ ]

Review Comment:

Reviewer name & signature:
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.

Saygilarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

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

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Shin Dongyeop  

Date: 12.07.2016

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**

NC number(s) :
Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major □</th>
<th>Minor □</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

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,” “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:
(S) 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 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.

There is no explanation regarding how to avoid organic production from contamination.
Protecting measures of contamination haven’t been documented as the contamination protecting procedures in all the production activities.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.201(a)(5)</th>
<th>205.272(a)</th>
<th>ETKO rules ref.</th>
<th>205.201(a)(5)</th>
<th>205.272(a)</th>
</tr>
</thead>
</table>

Action taken: The major source of contamination is regarded as water and it is monitored periodically. Protecting measures of contamination are attached.

Please identify the supporting documents, if any: Annex 1, 2, and 18, 19, 24- Protecting measures of contamination

Name, Surname and Signature of Appl. Resp. | Shin Dongyeop (b) (6) | Date | 04.07.2016 |
|-------------------------------------------|-----------------------|------|-------------|

Review Date | 11.07.2016 | Resolved ☑ | Unresolved □ |

Review Comment: The required documents are provided and they are proper. Protecting measures of contamination are attached.

Reviewer name & signature: Fatih Aksoy
# Notification of Resolution of Noncompliance

**3219F-01 Manna CEA**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major ☒</th>
<th>Minor ☐</th>
<th>Inspection Date</th>
<th>11.04.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>30.06.2016</td>
<td>Due Date</td>
<td>30.07.2016</td>
<td></td>
</tr>
</tbody>
</table>

**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,” “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.

There is no explanation for inputs used as products, organic certificate, manufacturing process, product brochure etc. They use sodium hypochlorite and water for cleaning. Cleaning procedures and its records of irrigation aren’t attached. Sodium hypochlorite and water is used. Sodium hypochlorite products specification isn’t attached.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.201.(a)</th>
<th>ETKO rules ref.</th>
<th>205.201.(a)</th>
</tr>
</thead>
</table>

**Action taken:** Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided.

Please identify the supporting documents, if any: [Annex 14, 15 and 31 of Input materials, Annex 18- Cleaning procedures and its records, Annex 19- Sodium hypochlorite specifications]

**Name, Surname and Signature of Appl. Resp.:** Shin Dongyeop

**Date:** 04.07.2016

**Review Date:** 11.07.2016

**Resolved ☒**

**Review Comment:** Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided.

**Reviewer name & signature:** Fatih Aksoy
Noncompliance No: 16.3

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.3</td>
<td>☒</td>
<td>☐</td>
<td>11.04.2016</td>
</tr>
</tbody>
</table>

Date of Notification: 30.06.2016

Due Date: 30.07.2016

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 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 report and chlorine concentration aren’t indicated.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.203 (c)(3)</th>
<th>ETKO rules ref.</th>
<th>205.203 (c)(3)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>205.203 (c)(3)</td>
<td></td>
<td>205.203 (c)(3)</td>
</tr>
</tbody>
</table>

Action taken: Water report is provided.

Please identify the supporting documents, if any: Annex 1 and 2 - Water Analyses

Name, Surname and Signature of Appl. Resp.: Shin Dongyeop

Date: 04.07.2016

Review Date: 11.07.2016

Resolution: Resolved ☒

Review Comment: Water report is provided.

Reviewer name & signature: Fatih Aksoy
### Notification of Resolution of Noncompliance

**3219F-01 Manna CEA**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Due Date</th>
</tr>
</thead>
</table>

**Date of Notification:** 30.06.2016

**Noncompliance:**

- **§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
    3. Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
  - (d) Disease problems may be controlled through:
    1. Management practices which suppress the spread of disease organisms; or
    2. Application of nonsynthetic biological, botanical, or mineral inputs.

**Pest, weed, and disease management program aren’t attached.**

**More details of neem oil aren’t attached such as products specification, organic certificate, manufacturing process, product brochure etc.**

**Disease management procedures haven’t been indicated by the producer.**

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.206 (a)</th>
<th>205.206 (d)</th>
<th>ETKO rules ref.</th>
<th>205.206 (a)</th>
<th>205.206 (d)</th>
</tr>
</thead>
</table>

**Action taken:** Pest, weed, and disease management program are provided. About neem oil OMRI Certificate and analysis report are provided. Disease management procedures are attached.

Please identify the supporting documents, if any: Annex 4-Neem oil Analyses Report, OMRI Certificate and Annex 4 & 5- Pest, weed, and disease management procedures.

**Name, Surname and Signature of Appl. Resp.**

Shin Dongyeop

<table>
<thead>
<tr>
<th>Date</th>
<th>04.07.2016</th>
</tr>
</thead>
</table>

**Review Date:** 11.07.2016

**Resolved** ✗

**Review Comment:** Pest, weed, and disease management program are provided. About neem oil OMRI Certificate and analysis report are provided. Disease management procedures are attached.

**Reviewer name & signature:** Fatih Aksoy
### Notification of Resolution of Noncompliance

**3219F-01 Manna CEA**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

**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 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 criteria**

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.202 (c)</td>
<td>205.202 (c)</td>
</tr>
</tbody>
</table>

**Action taken:** Detailed map of showing the circumstances are attached.

Please identify the supporting documents, if any: Annex 6- Maps

**Name, Surname and Signature of Appl. Resp.:** Shin Dongyeop

**Date:** 04.07.2016

**Review Date:** 11.07.2016

**Reviewer name & signature:** Fatih Aksoy
### Notification of Resolution of Noncompliance

**3219F-01 Manna CEA**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>11.04.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td></td>
<td></td>
<td>Date</td>
<td>30.06.2016</td>
</tr>
<tr>
<td>Due Date</td>
<td></td>
<td></td>
<td></td>
<td>30.07.2016</td>
</tr>
</tbody>
</table>

**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,” “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;

**Farm Production Report is not taken and not attached yet.**

**Inspection criteria** |
| NOP reg. ref | 205.201 (a)(2) | ETKO rules ref. | 205.201 (a)(2) |

**Action taken:** ‘Farm production report’ attached.

Please identify the supporting documents, if any: **Annex 7- Farm production report**

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Shin Dongyeop</th>
<th>(b) (6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>04.07.2016</td>
<td></td>
</tr>
</tbody>
</table>

**Review Date**

<table>
<thead>
<tr>
<th>11.07.2016</th>
</tr>
</thead>
</table>

**Resolved**

**Unresolved**

**Review Comment:** ‘Farm production report’ is attached.

Reviewer name & signature: **Fatih Aksoy**
**Noncompliance No:** 16.7  
**Major** ☐ **Minor** ☒  
**Inspection Date:** 11.04.2016

**Date of Notification:** 30.06.2016  
**Due Date:** 30.07.2016

**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,” “organic,” or “made with organic (specified ingredients or food group[es])” 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

Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.

**Inspection criteria** | **NOP reg. ref** | **ETKO rules ref.** | **Action taken**
---|---|---|---
205.201(a)(5) | | | It is managed in a closed system but maintained biodiversity by planting a variety of species.

Please identify the supporting documents, if any: **Annex 28- Declaration**

**Name, Surname and Signature of Appl. Resp.:** Shin Dongyeop  
**Date:** 04.07.2016

**Review Date:** 11.07.2016  
**Resolved** ☒ **Unresolved** ☐

**Review Comment:** The Declaration regarding this issue is provided.

**Reviewer name & signature:** Fatih Aksoy
Dear Madam / Sir: Okunenko Igor Nicolaievich

Date: 02.01.2016

On the dates (04.08.2016) ETKO Inspector 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.

<table>
<thead>
<tr>
<th>Report no</th>
<th>Product Name</th>
<th>Operator</th>
<th>Store-Land</th>
<th>Substances</th>
<th>Residue (mg/kg)</th>
<th>EPA Tolerance</th>
<th>5% of EPA Tolerance</th>
<th>Result</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20360</td>
<td>Soybean Plants</td>
<td>3080F-01 Rinagro</td>
<td>Field No</td>
<td>Pyraclostrobin</td>
<td>0,139</td>
<td>None</td>
<td>0,01</td>
<td>Noncompliance</td>
<td>26.08.2016</td>
</tr>
<tr>
<td>OZ140004</td>
<td>Soybean Plants</td>
<td>3080F-01 Rinagro</td>
<td>Field No</td>
<td>Pyraclostrobin</td>
<td>0,064</td>
<td>None</td>
<td>0,01</td>
<td>Noncompliance</td>
<td>14.10.2016</td>
</tr>
</tbody>
</table>

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 NOPACAAverseActions@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

### Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
</tr>
</thead>
<tbody>
<tr>
<td>3080F-01</td>
<td>RinAgro</td>
</tr>
</tbody>
</table>

Location - Address

29, Askaniyskoy street, Chaplynka, Kherson region, Ukraine

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>Surveillance Inspection</th>
<th>Report no</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>3080-2016.ma</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Analyses</th>
<th>Std or reg. Art. nr.</th>
<th>NCR No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>04.08.2016</td>
<td>NOP 205.105</td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>14.10.2016</td>
<td>Due Date</td>
<td>14.11.2016</td>
</tr>
</tbody>
</table>

- ☑ Major S2. 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 allowed by the regulations.
- ☐ Production process plan partly implemented.

- ☐ Non-Organic product sales as organic.
- ☐ Requirements of regulation or standard not applied
- ☐ Frequent minor non-conformities on the same requirement of regulation.
- ☐ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- ☐ Misuse of the licenses and certificates
- ☐ Production process plan not implemented.

### Description of Nonconformity by Inspector

§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) Non-synthetic substances prohibited in §205.602 or §205.604;
- (c) Non-agricultural substances used in or on processed products, except as otherwise provided in §205.605;
- (d) Non-organic 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.

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 №1. Distance from source of contamination was approximately 150 meters. Source of contamination was found – a small conventional garden next to the field №1.

There is no direct use of any chemical substances however, Pyraclostrobin is a fungicide used for fruits and the neighbor as the owner of the conventional fruit garden next to the field №1 confirmed that they’ve used this substance for their fruit trees treatment. So, the source of contamination is the neighbor’s conventional fruit garden. Thus, RinAgro and Sadeko agreed on the following monitoring plan for neighboring areas for the next years:
- March 2017 - soil from the field №1 sampling and analysis,
- May-June 2017 - sampling and analysis of young crops/plants from field №1 in the period of vegetation (depending on the crop that will be sown),
- July-September 2017 - sampling and analysis of available product from field №1 (depending on the crop that will be sown)
|-------------|------------|-----------------------------|---------------|------------------------|------------|

**Verification of Operator’s corrective action and implementation by ETKO**

**Accepted:** YES [x]  NO [ ]  **Date:** 20.12.2016  **ETKO approval:** Mustafa Akyüz

**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.
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.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Okunenko Igor Nicolaevich

Date: 14.10.2016

On the dates 04.08.2016 ETKO Inspector 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.

<table>
<thead>
<tr>
<th>Report no</th>
<th>Product Name</th>
<th>Operator</th>
<th>Store-Land</th>
<th>Substances</th>
<th>Residue (mg/kg)</th>
<th>EPA Tolerance</th>
<th>5% of EPA Tolerance</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>02140004</td>
<td>Soybean Plants</td>
<td>3080F-01 RinAgro</td>
<td>Field No</td>
<td>Pyraclostrobin</td>
<td>0,064</td>
<td>None</td>
<td>0,01</td>
<td>Noncompliance</td>
</tr>
</tbody>
</table>

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 NOPACAAverseActions@ams.usda.gov

Non-compliances:
**Notification of Noncompliance**

**3080F-01 RinAgro**

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

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

**Initial Inspection**  
**Surveillance Inspection**  
**Report no 3080-2016.ma**

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Analyses</th>
<th>Std or reg. Art. nr. NOP 205.105</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>04.08.2016</td>
<td>Due Date</td>
<td>14.11.2016</td>
</tr>
<tr>
<td>Date of Notification</td>
<td>14.10.2016</td>
<td>Due Date</td>
<td>14.11.2016</td>
</tr>
</tbody>
</table>

- Major S2. 7.4
- Minor

1. Factors causing risk on the product  
2. Factors causing no risk on the condition of the product.
3. Use of inputs which are not allowed by the regulations.
5. Requirements of regulation or standard not applied.
6. Frequent minor non-conformities on the same requirement of regulation.
7. Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
8. Misuse of the licenses and certificates
9. Production process plan not implemented.

**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 179.29; and  
- (g) Sewage sludge.

**Issues:**
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.  

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Operator name and signature</th>
<th>Igor Okunenko</th>
</tr>
</thead>
</table>

**Corrective Action Plan by Operator**

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.11.2016</td>
<td>Igor Okunenko</td>
<td></td>
</tr>
</tbody>
</table>

**Verification of Operator's corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted:</th>
<th>YES</th>
<th>NO</th>
<th>Date</th>
<th>ETKO approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Explanations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Okunenko Igor Nicolaevich

On the dates (04.08.2016) ETKO Inspector 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.

<table>
<thead>
<tr>
<th>Report no</th>
<th>Product Name</th>
<th>Operator</th>
<th>Store-Land</th>
<th>Substances</th>
<th>Residue (mg/kg)</th>
<th>EPA Tolerance</th>
<th>5% of EPA Tolerance</th>
<th>Result</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20360</td>
<td>Soybean Plants</td>
<td>3080F-01 RinAgro</td>
<td>Field No</td>
<td>Pyraclostrobin</td>
<td>0,139</td>
<td>None</td>
<td>0,01</td>
<td>Noncompliance</td>
<td>26.08.2016</td>
</tr>
<tr>
<td>02140004</td>
<td>Soybean Plants</td>
<td>3080F-01 RinAgro</td>
<td>Field No</td>
<td>Pyraclostrobin</td>
<td>0,064</td>
<td>None</td>
<td>0,01</td>
<td>Noncompliance</td>
<td>14.10.2016</td>
</tr>
</tbody>
</table>

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 NOPACAAverseActions@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

**Operator unit no.** | 3080F-01
---|---
**Unit name** | RinAgro

**Location - Address:** 29, Askaniyskoy street, Chaplynka, Kherson region, Ukraine

---

**Initial Inspection** | Surveillance Inspection | Report no 3080-2016.ma
---|---|---

### Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
<th>Location - Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3080F-01</td>
<td>RinAgro</td>
<td>29, Askaniyskoy street, Chaplynka, Kherson region, Ukraine</td>
</tr>
</tbody>
</table>

---

**Subject of nonconformity**

- Analyses
- Std or reg. Art. nr. NOP 205.105
- NCR No 2016.1

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>04.08.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>14.10.2016</td>
</tr>
<tr>
<td>Due Date</td>
<td>14.11.2016</td>
</tr>
</tbody>
</table>

**Factors causing risk on the product**

- Use of inputs which are not allowed by the regulations.
- Non-Organic product sales as organic.
- Requirements of regulation or standard not applied
- Frequent minor non-conformities on the same requirement of regulation.
- Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates
- Production process plan not implemented.

---

**Description of Nonconformity by Inspector**

> §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) Nonagricultural 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.

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: [Signature]

Operator name and signature: Igor Okunenko

---

**Corrective Action Plan by Operator**

There is no direct use of any chemical substances however, Pyraclostrobin is a fungicide used for fruits and the neighbor as the owner of the conventional fruit garden next to the field Nr. confirmed that they’ve used this substance for their fruit trees treatment. So, the source of contamination is the neighbor’s conventional fruit garden. Thus, RinAgro and Sadeko agreed on the following monitoring plan for neighboring areas for the next years:

- **March 2017** - soil from the field no. sampling and analysis,
- **May-June 2017** - sampling and analysis of young crops/plants from field no. in the period of vegetation (depending on the crop that will be sown),
- **July-September 2017** - sampling and analysis of available product from field no. (depending on the crop that will be sown)
### Target date | Operator name and signature | Actual Completion date |
|--------------|-----------------------------|------------------------|

**Verification of Operator’s corrective action and implementation by ETKO**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>Date</th>
<th>ETKO approval</th>
<th>Mustafa Akyüz</th>
</tr>
</thead>
<tbody>
<tr>
<td>YES</td>
<td>02.01.2017</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Explanations:** According to our inspector, a sample of soya plants was taken in the middle of the field. Distance from source of contamination was approximately 150 meters. Source of contamination was found – a small conventional garden next to the field. We decided to transfer the whole field 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.
Dear Sirs,

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

Thank you.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

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

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.

Saygılarımızla/ Best Regards
Ceren BAYAZIT
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 me.

Thank you.

Saygılarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekolojik Tarıım Kontrol Org. Ltd. Şti.
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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: **Ilin Ivan Alekseevich**  
Date: **23.06.2016**

On the date **(11.12.2015)** ETKO Inspector 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) :
**Resolved Noncompliances:**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>☒</td>
<td>☐</td>
<td>11.12.2015</td>
<td>23.06.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

**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.

**Action taken:**

Storages were swept, stains were cleaned. Storage cleansing register was unimplemented.

**Inspection criteria**

- NOP reg. ref
- 205.272a
- ETKO rules ref.
- 834-Article 12.1
- IACB 6.5.3, 11.1

**Please identify the supporting documents, if any:**

Name, Surname and Signature of Appl. Resp.: Ilin Ivan Alekseevich

Date: 11.04.2016

Review Date: 30.04.2016

Resolved ☒

Review Comment: Storage cleaning register is presented. (last cleaning is done 25.04.2016 by [ ]) (4) .

Reviewer name & signature: Fatih Aksoy
Noncompliance No: 2  
Major ☐  Minor ☒  Inspection Date: 11.12.2015

Date of Notification: 23.06.2016  
Due Date: 02.05.2016

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,” 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;

1.3 OCP Annex Farm Production Report, “Farm Plot Inventory, propagation material and Pest Management” were not completed for all sections.

Action taken: All sections of the Annex were finished.

Inspection criteria:
- NOP reg. ref: 205.203 (c), 205.205
- ETKO rules ref: 834-Art.4, 5, IACB 4.1, 4.2, 6.4.3, 5.1 OCP, 1.3 OCP

Please identify the supporting documents, if any: OCP Annex Farm Production Report

Name, Surname and Signature of Appl. Resp.: Ilin Ivan Alekseevich  
Date: 07.04.2016

Review Date: 30.04.2016  
Resolved ☒  Unresolved ☐

Review Comment: Confirmed. See Annex.

Reviewer name & signature: Fatih Aksoy
## Notification of Resolution of Noncompliance

### 3216F-01 Helliantus LLC

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>11.12.2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>23.06.2016</td>
<td></td>
<td>Due Date</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

### §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.

### 14.1 OCP

They have map of farm fields but buffer zones are not described well.

### 14.2 OCP

Buffer zones are not indicated on the fields map

### 14.3 OCP

Director knows neighbors of the farm, but description was not made on the map.

### Inspection criteria

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>§205.202</th>
<th>ETKO rules ref.</th>
<th>834-Article 12.1, IACB 6.5.3, 14.1-14.3 OCP</th>
</tr>
</thead>
</table>

### Action taken

The field map was redrawn with the indication of the neighbors and buffer zones.

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Ilin Ivan Alekseevich</th>
<th>Date</th>
<th>04.04.2016</th>
</tr>
</thead>
</table>

### Review Date

30.04.2016

Resolved ☒

Unresolved ☐

### 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
§205.204 Seeds and planting stock practice standard.  
(a) The producer must use organically grown seeds, annual seedlings, 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  
variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;  

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td></td>
<td>☒</td>
<td>11.12.2015</td>
</tr>
</tbody>
</table>

Date of Notification: 23.06.2016  
Due Date: 02.05.2016  

16.2- 16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided.  
16.4 OCP Vendor Declaration is not present.  
16.5 OCP Annex Farm Production Report, “Propagation Material” invoices and certificates for all used seeds not provided.  

Inspection criteria  
NOP reg. ref  
§205.202  
ETKO rules ref.  
834-Article 12.1, IACB 6.5.3, 14.1-14.3 OCP  

Action taken: Propagation Material Approval form was filled in, the letter about absence of organic seeds is submitted. OCP Vendor Declaration and some of the certificates are not present, because in spring 2015 the farm was not under organic regulations and didn’t get everything.  

Please identify the supporting documents, if any: Prop. Material Approval Form, Letter about seeds  

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ilin Ivan Alekseevich</td>
<td>07.04.2016</td>
</tr>
</tbody>
</table>

Review Date: 30.04.2016  
Resolved ☒  
Unresolved ☐  

Review Comment: Letters, forms and certificates, invoices are presented. See annexes. Corn was sold as conventional.  

Reviewer name & signature: Fatih Aksoy
Dear Madam / Sir: Struk Victor Ivanovych

Date: 23.06.2016

On the date (11.12.2015) ETKO Inspector 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

### Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>☑</td>
<td>☐</td>
<td>11.12.2015</td>
<td>23.06.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

**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,

-Sowing machines has traces of red color, which was explained that they used to treat seeds in the past. No treatment was done for 2015 crops because producer decided to start with organic production. See picture.

**Inspection criteria**

- NOP reg. ref 205.272
- ETKO rules ref. 834-Article 12.1 IACB 6.5.3, 11.1 OCP, 11.3 OCP, 11.4 OCP

**Action taken:** Bunkers of sowing machines were washed.

Please identify the supporting documents, if any: 3216F-02 Dovira - Register of cleaning

**Name, Surname and Signature of Appl. Resp.:** Struk Victor Ivanovych

**Date:** 05.04.2016

**Review Date:** 30.04.2016

Resolved ☑

Unresolved ☐

**Review Comment:** Register of machines cleaning is presented. Sowing machines were cleaning by water. 03.03.2016, 08.04.2016

**Reviewer name & signature:** Fatih Aksoy
Noncompliance No 2

Date of Notification 23.06.2016

Due Date 02.05.2016

§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;

1.3 OCP Annex Farm Production Report, “Farm Plot Inventory, propagation material and Pest Management” were not completed for all sections.

Action taken: OCP Annex Section “Summary All Farms” was filled in and completed.

Please identify the supporting documents, if any: 3216F-02 2015 June OP 01 F 28 Farm Production Report Client.20150525

Name, Surname and Signature of Appl. Resp. Struk Victor Ivanovych

Date 06.04.2016

Review Date 30.04.2016

Resolved ☒ Unresolved ☐

Review Comment: Confirmed. Form is filled.

Reviewer name & signature: Fatih Aksoy
§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.

14.1 OCP They have map of farm fields but buffer zones are not described well.
14.2 OCP Buffer zones are not indicated on the fields map
14.3 OCP Director knows neighbors of the farm, but description was not made on the map.

Action taken: The field map was redrawn with the indication of the neighbors and buffer zones.

Review Comment: The map with indication of neighbors and buffer zones is presented. See annex.
**Notification of Resolution of Noncompliance**

**3216F-02 Dovira**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>☐</td>
<td>☑</td>
<td>11.12.2015</td>
<td>23.06.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

§205.204 Seeds and planting stock practice standard.

(a) The producer must use organically grown seeds, annual seedlings, 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 variety is not commercially available. Except, That, organically produced seed must be used for the production of edible sprouts;

16.2 -16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided.

16.4 OCP Vendor Declaration is not present

16.5 OCP Annex Farm Production Report, “Propagation Material” Invoices and certificates for all used seeds not provided

**Inspection criteria**

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
<th>IACB 6.4.1, 6.4.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.204a(1)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Action taken: Propagation Material Approval forms were filled in, the letter about absence of organic seeds was submitted. Vendor declaration for corn is failed to be taken because the farm isn’t working with its supplier anymore.

Please identify the supporting documents, if any: 3216F-02 Dovira - Propagation materials certificates and invoices,

3216F-02 Dovira - TI 45 F 01 Propagation Material Approval Form

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Struk Victor Ivanovych</td>
<td>05.04.2016</td>
</tr>
</tbody>
</table>

Review Date: 30.04.2016

Resolved ☒

Unresolved ☐

Review Comment: **Seeds certificates, invoices and, propagation material approval form were presented. Risky GMO product as corn was sold as conventional.**

Reviewer name & signature: Fatih Aksoy
Dear Madam / Sir: Zadorozhniy Vitaliy Mikhailovich

Date: 23.06.2016

On the date (10.12.2015) ETKO Inspector 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) :
Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>✗</td>
<td>☐</td>
<td>10.12.2015</td>
<td>23.06.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

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 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 criteria

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.272</th>
<th>ETKO rules ref.</th>
<th>IACB 6.5.3, 11.1</th>
</tr>
</thead>
</table>

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

Name, Surname and Signature of Appl. Resp. Zadorozhniy Vitaliy Mikhailovich Date 05.04.2016

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 repaired. The sowing machines are cleaned. No traces are in places. See pictures.

Reviewer name & signature: Fatih Aksoy
## Notification of Resolution of Noncompliance

**3216F-03 Zhytnitsa**

### Noncompliance No: 2

- Major: √
- Minor: □

- **Inspection Date:** 10.12.2015
- **Date of Notification:** 23.06.2016
- **Due Date:** 02.05.2016

**§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 container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and:

- Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.

**There are no labels on the storages and stored crops are not marked.**

**Action taken:** Storage and crops marking labels are implemented. Procedure of crops marking is made.

Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction for storage personnel, 3216F-03 Zhytnitsa - Storages 1-7

**Name, Surname and Signature of Appl. Resp.:** Zadorozhniy Vitaliy Mikhailovich

**Date:** 04.04.2016

**Review Date:** 30.04.2016

- **Resolved:** √
- **Unresolved:** □

**Review Comment:** Labels are prepared and approved by ETKO. Storages are marked by labels. See pictures and annexes.

**Reviewer name & signature:** Fatih Aksoy
§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;

1.3 OCP Annex Farm Production Report, “Farm Plot Inventory, propagation material and Pest Management” were not completed for all sections.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>§205.103</th>
<th>ETKO rules ref.</th>
<th>IACB 10.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken : OCP Annex Farm Production Report was completed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any: 3216F-03 2015 June OP 01 F 28 Farm Production Report Client.20150525

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zadorozniy Vitaliy Mikhailovich</td>
<td>04.04.2016</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Review Date</th>
<th>Resolved</th>
<th>Unresolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.04.2016</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

Review Comment: Annex Farm Production Report is presented and all sections are filled. See annexes.

Reviewer name & signature: Fatih Aksoy
### Notification of Resolution of Noncompliance

**Noncompliance No**: 4  
**Major**: ☐  
**Minor**: ☒  
**Inspection Date**: 10.12.2015  
**Date of Notification**: 23.06.2016  
**Due Date**: 02.05.2016

§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.

11.3-11.4 OCP They have no instructions and procedures to keep integrity of organic products against any contamination risks.

**Inspection criteria**  
NOP reg. ref □  
.§205.272 □  
ETKO rules ref. □  
IACB 6.5.3, 11.3 OCP, 11.4 OCP

**Action taken**: “The Instruction for warehouse’s personnel” and “The Instruction for providing organic integrity” are developed. The principles of organic integrity are defined there.

Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction of organic farming, 3216F-03 Zhytnitsa - Instruction for storage personnel

**Name, Surname and Signature of Appl. Resp.**: Zadorozhny Vitaliy Mikhailovich  
**Date**: 04.04.2016

**Review Date**: 30.04.2016  
**Resolved**: ☒  
**Unresolved**: ☐

**Review Comment**:  
- instructions about organic growing, storing are in place  
- trainings of responsible were done,  
- storages are marked and clean (cleanings are registered) See annex.

**Reviewer name & signature**: Fatih Aksoy
### Notification of Resolution of Noncompliance

**3216F-03 Zhytnitsa**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minör</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td></td>
<td>✗</td>
<td>10.12.2015</td>
<td>23.06.2016</td>
<td>02.05.2016</td>
</tr>
</tbody>
</table>

#### §205.202 Land requirements.

Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:

- Have been managed in accordance with the provisions of §§205.203 through 205.206;
- 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
- 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.

#### 14.1 OCP

- **They have map of farm fields but buffer zones are not described well.**
- **14.2 OCP Buffer zones are not indicated on the fields map**
- **14.3 OCP Director knows neighbors of the farm, but description was not made on the map.**

### Inspection criteria

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>§205.202</th>
<th>ETKO rules ref.</th>
<th>IACB 6.5.3, 14.1-14.3 OCP</th>
</tr>
</thead>
</table>

Action taken: **The map of farm fields with the description of neighbors and buffer zones is present.**

Please identify the supporting documents, if any: **3216F-03 Zhytnitsa - Map with indicated BZ**

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Review Date</th>
<th>Resolve</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.04.2016</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Resolved</td>
</tr>
</tbody>
</table>

Review Comment: **Neighbors of farm are indicated on the map. Risky BZs are marced on the map by red color. They care about buffer zones. They carried out training for workers about growing organic goods. See annexe – map of farm.**

Reviewer name & signature: **Fatih Aksoy**
### Notification of Resolution of Noncompliance

**3216F-03 Zhytnitsa**

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minör</th>
<th>Inspection Date</th>
<th>10.12.2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>23.06.2016</td>
<td>Due Date</td>
<td>02.05.2016</td>
<td></td>
</tr>
</tbody>
</table>

§205.204 Seeds and planting stock practice standard.
(a) The producer must use organically grown seeds, annual seedlings, 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 variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;

16.2·16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided.
16.4 OCP Vendor Declaration is not present
16.5 OCP Annex Farm Production Report, “Propagation Material” Invoices and certificates for all used seeds not provided

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.204a(1)</th>
<th>ETKO rules ref.</th>
<th>IACB 6.4.1, 6.4.2</th>
</tr>
</thead>
</table>

Action taken: Propagation Material Approval forms were filled in, the letter about absence of organic seeds is present. There were no cultures of GMO risk in 2015, so Vendor declaration is not present. Some certificates are not present, because 2015 harvest wasn’t the organic harvest, it was sold as conventional.

Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Propagation material approval form, 3216F-03 Zhytnitsa - Propagation material certificates 2015, 3216F-03 Zhytnitsa - Propagation material invoices 2015

|-------------------------------------------|----------------------------------|------|-------------|

Review Date | 30.04.2016 | Resolved | X |

Review Comment: Seeds Approval forms are provided also presented all documents related to seeds: invoices, acts of acceptance, certificates. Last season they didn’t produce corn, soya or rapeseed (hi-risk GMO products)- VD is not needed.

Reviewer name & signature: Fatih Aksoy
Dear Madam / Sir: Umit CAKMAK

On the dates (21.07.2016) ETKO Inspector Mr./ Mrs. ) realized an application review □/ initial □ / continuing ✓ / recertification □ / surveillance inspection to your operation. The objective of the review was to ensure the completeness of your application / inspection was to determine the your organic operation’s compliance against the regulation(s):

USDA National Organic Program

Based on the application review findings / inspection report dated...21.07.2016.., 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......25.08.2016.............. (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. Fatih AKSOY from ETKO +90-232-3397606 or by email at: fa@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team  NOPACAAverseActions@ams.usda.gov
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,” “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 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;

205.201.a.5 , 205.103.b.2 The storage spaces of organic raw material aren’t indicated on the OCP report. During the inspection, it was stated that the storing activity can be carried out in 3 different warehouses and these are located in Menemen and Turgutlu storages of the operator. And there are neither the facility site plans nor a document of ownership or rental agreement for the warehouses in their record.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action taken</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp. | Date |
--- | --- |
Review Date | Resolved ☐ | Unresolved ☐ |
Review Comment: |
Reviewer name & signature: |

Date of Notification: 01.08.2016  Due Date: 30.08.2016

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.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.272.a</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
</table>

Action taken

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp.  Date

Review Date  Resolved [ ]  Unresolved [x]

Review Comment:

Reviewer name & signature:
Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.3</td>
<td>□</td>
<td>☑</td>
<td>21.07.2016</td>
<td>01.08.2016</td>
<td>30.08.2016</td>
</tr>
</tbody>
</table>

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.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 Susitaş but there is no record to evidence that.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>205.272.b.2</td>
<td>205.103.b.2</td>
</tr>
</tbody>
</table>

Action taken

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
</table>

Review Date

Resolved □
Unresolved □

Review Comment:

Reviewer name & signature:
Noncompliance No | Major | Minor | Inspection Date | Date of Notification | Due Date
---|---|---|---|---|---
16.4 | | ☑ | 21.07.2016 | 01.08.2016 | 30.08.2016

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,” 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.

205.103.b.2, 205.103.c – During the inspection, only the accounting records of organic capers were found, conventional caper records and the stock-sales charts were not prepared for the inspection.

- The stock records for the auxiliary product (citric acid) used in the organic production weren’t seen and so, the mass balance calculation/stock record account for the remaining citric acid input couldn’t be made (for the citric acid input used in the organic production 3+ ¾ sack of branded citric acid whereas in the conventional production 1 sack of branded citric acid used were seen but, they couldn’t be found on the inventory card.)

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>205.103.b.2, 205.103.c</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Action taken**

Please identify the supporting documents, if any:

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
</table>

**Review Date**

- Resolved ☐
- Unresolved ☐

**Review Comment:**

Reviewer name & signature:
Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Date of Notification</th>
<th>Inspection Date</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.5 Major ☒</td>
<td>01.08.2016</td>
<td>21.07.2016</td>
<td>30.08.2016</td>
</tr>
</tbody>
</table>

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.

§205.271 Facility pest management practice standard.

(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:
(1) Removal of pest habitat, food sources, and breeding areas;
(2) Prevention of access to handling facilities; and
(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.
(b) Pests may be controlled through:
(1) Mechanical or physical controls including but not limited to traps, light, or sound; or
(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.
(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.
(d) If the practices provided for in paragraphs (a), (b), and (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: Provided, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.
(e) The handler of an organic handling operation who applies a nonsynthetic or synthetic substance to prevent or control pests must update the operation's organic handling plan to reflect the use of such substances and methods of application. The updated organic plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.
(f) Notwithstanding the practices provided for in paragraphs (a), (b), (c), and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations: Provided, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.

205.105.a.b, 205.271.e - Although they indicated that they didn’t apply indoor spraying, it was seen that Susitaş were notified on their performance report dated 16.03.2016 as “the use of a prohibited substance not defined on the NOP National List, cypermethrin (prohibited chemical material) had been detected in all the areas” by the pest control company they cooperate with. (b) (4) ______________.” The company officials pointed out that it could be written by mistake that there was spraying in all the areas including the production area. This was not updated on OCP.

Inspection criteria | NOP reg. ref | 205.105.a.b, 205.271.e | ETKO rules ref.

Action taken

Please identify the supporting documents, if any:

Name, Surname and Date
<table>
<thead>
<tr>
<th><strong>Signature of Appl. Resp.</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review Date</strong></td>
<td><strong>Resolved</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Unresolved</strong></td>
</tr>
<tr>
<td><strong>Review Comment:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Reviewer name &amp; signature:</strong></td>
<td></td>
</tr>
</tbody>
</table>
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.

Saygılarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Umit CAKMAK

Date: 30.08.2016

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) :
Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.1</td>
<td>☒</td>
<td></td>
<td>21.07.2016</td>
<td>01.08.2016</td>
<td>30.08.2016</td>
</tr>
</tbody>
</table>

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,” “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 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;

205.201.a.5, 205.103.b.2 The storage spaces of organic raw material aren’t indicated on the OCP report. During the inspection, it was stated that the storing activity can be carried out in 3 different warehouses and these are located in Menemen and Turgutlu storages of the operator. And there are neither the facility site plans nor a document of ownership or rental agreement for the warehouses in their record.

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 supporting documents, if any: The photos of raw materials at Çiğli facility at the attachment.

Name, Surname and Signature of Appl. Resp. | Umit CAKMAK | Date 29.08.2016

Review Date | 30.08.2016 | Resolved ☒ Unresolved □

Review Comment:
All organic raw materials have been transferred to Çiğli facility and the related evidences are provided. (See annex resolution NC 1)

Reviewer name & signature: Mustafa AKYÜZ
Noncompliance No: 16.2

Date of Notification: 01.08.2016

Due Date: 30.08.2016

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.

Action taken

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 Signature of Appl. Resp: Umit CAKMAK Date: 29.08.2016

Review Date: 30.08.2016

Resolved ☒ Unresolved ☐

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 AKYÜZ
Noncompliance No | 16.3 | Major [ ] Minor [x] | Inspection Date | 21.07.2016 |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>01.08.2016</td>
<td>Due Date</td>
<td>30.08.2016</td>
<td></td>
</tr>
</tbody>
</table>

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.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 Susitaş but there is no record to evidence that.

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>205.272.b.2</td>
<td>205.103.b.2</td>
</tr>
</tbody>
</table>

Action taken:
Records are attached.

Please identify the supporting documents, if any: PR_631_FR_20__BİDON TEMİZLİK VE SAĞLAMLIK KONTROL FORMU

Name, Surname and Signature of Appl. Resp. | Umit CAKMAK | Date | 29.08.2016 |
|------------------------------------------|--------------|------|-------------|

Review Date | 30.08.2016 | Resolved [x] Unresolved [ ] |

Review Comment:
Evidence of cleaning records was provided. (See annex resolution NC 3)

Reviewer name & signature: Mustafa AKYÜZ
Notification of Resolution of Noncompliance
2158D-01 SUSITAS

Noncompliance No 16.4

Date of Notification 01.08.2016

Due Date 30.08.2016

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,” 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.

205.103.b.2, 205.103.c – During the inspection, only the accounting records of organic capers were found, conventional caper records and the stock-sales charts were not prepared for the inspection.
- The stock records for the auxiliary product (citric acid) used in the organic production weren’t seen and so, the mass balance calculation/ stock record account for the remaining citric acid input couldn’t be made (for the citric acid input used in the organic production 3+ ¾ sack of branded citric acid whereas in the conventional production 1 sack of branded citric acid used were seen but, they couldn’t be found on the inventory card.)

Inspection criteria

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref.</th>
<th>205.103.b.2, 205.103.c</th>
<th>ETKO rules ref.</th>
</tr>
</thead>
</table>

Action taken

See the attached list for organic conventional caper inventory records and the stock records for using inputs and input invoices.

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp. Umit CAKMAK

Date 29.08.2016

Review Date 30.08.2016

Resolved [X] Unresolved [ ]

Review Comment:

Organic conventional caper inventory records were provided.
The stock records for using inputs and input invoices were provided.
(See annex resolution NC 4)

Reviewer name & signature: Mustafa AKYÜZ
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.

§205.271  Facility pest management practice standard.
(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:
(1) Removal of pest habitat, food sources, and breeding areas;
(2) Prevention of access to handling facilities; and
(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.
(b) Pests may be controlled through:
(1) Mechanical or physical controls including but not limited to traps, light, or sound; or
(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.
(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.
(d) If the practices provided for in paragraphs (a), (b), and (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: Provided, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.
(e) The handler of an organic handling operation who applies a nonsynthetic or synthetic substance to prevent or control pests must update the operation’s organic handling plan to reflect the use of such substances and methods of application. The updated organic plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.
(f) Notwithstanding the practices provided for in paragraphs (a), (b), (c), and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations: Provided, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.

205.105.a.b, 205.271.e - Although they indicated that they didn’t apply indoor spraying, it was seen that Susitas were notified on their performance report dated 16.03.2016 as “the use of a prohibited substance not defined on the NOP National List, cypermethrin (prohibited chemical material) had been detected in all the areas” by the pest control company they cooperate with. The company officials pointed out that it could be written by mistake that there was spraying in all the areas including the production area. This was not updated on OCP.

Action taken

The pest control company officials accept that they made a mistake when writing on the report. Actually they made application for outdoor areas and the offices. The pest control officer came to the facility and corrected the report signing it.

Please identify the supporting documents, if any: The fixed pest control report

Name, Surname and Signature of Appl. Resp.  Umit CAKMAK  Date  29.08.2016
<table>
<thead>
<tr>
<th>Review Date</th>
<th>30.08.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resolved</td>
<td>☒</td>
</tr>
<tr>
<td>Unresolved</td>
<td></td>
</tr>
</tbody>
</table>

Review Comment:

The company that is responsible for pest rodent control corrected their report as there was no any spraying in indoor areas, and the company declared that the report in question was prepared inexacty. (See annex resolution NC 5)

Reviewer name & signature: Mustafa AKYÜZ
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:
ma@etko.com.tr  info@etko.com.tr

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team  NOPACAAverseActions@ams.usda.gov
Notification of Noncompliance
3220F-01 AgroDIS

Non-compliances:
Operator unit no. 3220F-01  Unit name  AgroDIS
Location - Adres  v.Kohovka, Ananievska district, Odessa region Ukraine
Initial Inspection  Surveillance Inspection  Report no 3220F-01.2016.ac

Subject of nonconformity  Documentation  Std or reg. nr. NOP 205.201(a2)  NCR No 2016.1

Inspection Date  09.09.2016
Date of Notification  17.11.2016  Due Date  17.12.2016

- Minor M1-6.1, 7.7, 8.2
- Factors causing no risk on the condition of the product.
- Production process plan partly implemented.
- Minor M1-6.1, 7.7, 8.2
- Factors causing no risk on the condition of the product.
- Production process plan partly implemented.

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:
- Organic fertilizers and plant protectors were not assessed by ETKO before application
- Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO.

Inspector Name and signature  Operator name and signature  Suslova Lina Ivanivna

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  Suslova Lina Ivanivna  Actual Completion date

Verification of Operator’s corrective action and implementation by ETKO
Accepted: YES  NO  Date  ETKO approval
Explanations:
Dear Madam / Sir: Oliyarchuk Ivan Ivanovich  

Date: **17.11.2016**

On the dates (10.09.2016) ETKO Inspector 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: 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-02 SVITANOK Stari Mayaky**

<table>
<thead>
<tr>
<th>Non-compliances:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator unit no.</td>
</tr>
<tr>
<td>Unit name</td>
</tr>
<tr>
<td>Location - Adres</td>
</tr>
</tbody>
</table>

Initial Inspection [ ] Surveillance Inspection [ ] Report no 3220F-02.2016.ac

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Documentation</th>
<th>Std or reg. Art. nr.</th>
<th>NOP 205.201(a2)</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>10.09.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of Notification</td>
<td>17.11.2016</td>
<td>Due Date</td>
<td>17.12.2016</td>
<td></td>
</tr>
<tr>
<td>□ Major</td>
<td>□ Minor M1-6.1, 7.7, 8.2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Factors causing no risk on the product</td>
<td>□ Factors causing no risk on the condition of the product</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Use of inputs which are not allowed by the regulations</td>
<td>□ Production process plan partly implemented</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Non-Organic product sales as organic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Requirements of regulation or standard not applied</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Frequent minor non-conformities on the same requirement of regulation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Misuse of the licenses and certificates</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Production process plan not implemented</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**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:**
- Organic fertilizers and plant protectors were applied without ETKO approval.
- Propagation Material Approval form is not done before sowing, Seeds were not approved by ETKO.

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Operator name and signature</th>
<th>Oliyarchuk Ivan Ivanovich</th>
</tr>
</thead>
</table>

**Corrective Action Plan by Operator**

Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Oliyarchuk Ivan Ivanovich</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17.12.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

Accepted: YES [ ] NO [ ] Date [ ] ETKO approval [ ]

Explanations:
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.

Saygilarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
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: ma@etko.com.tr  info@etko.com.tr  .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team  NOPACAAverseActions@ams.usda.gov
**Notification of Noncompliance**

3220F-03 TOV AGROFIRMA MARYANIVSKA

<table>
<thead>
<tr>
<th>Non-compliances:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator unit no.</td>
</tr>
<tr>
<td>Unit name</td>
</tr>
<tr>
<td>Location - Adres</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Initial Inspection</th>
<th>Surveillance Inspection</th>
<th>Report no 3220F-03.2016.ac</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Documentation</th>
<th>Std or reg. Art. nr. NOP 205.201(a2)</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>□ Major</th>
<th>□ Minor M1-6.1, 7.7, 8.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Factors causing risk on the product</td>
<td>Factors causing no risk on the condition of the product</td>
</tr>
<tr>
<td>Use of inputs which are not allowed by the regulations</td>
<td>Production process plan partly implemented</td>
</tr>
<tr>
<td>Non-Organic product sales as organic</td>
<td></td>
</tr>
<tr>
<td>Requirements of regulation or standard not applied</td>
<td></td>
</tr>
<tr>
<td>Frequent minor non-conformities on the same requirement of regulation</td>
<td></td>
</tr>
<tr>
<td>Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available</td>
<td></td>
</tr>
<tr>
<td>Misuse of the licenses and certificates</td>
<td></td>
</tr>
<tr>
<td>Production process plan not implemented</td>
<td></td>
</tr>
</tbody>
</table>

**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:**
- Organic fertilizers were not assessed by ET KO before application.
- Plant protectors were not assessed by ET KO before application.
- Seeds were not approved by ET KO before sowing.

**Corrective Action Plan by Operator**

Seeds, Organic fertilizers and plant protectors will be applied with ET KO approval in future.

<table>
<thead>
<tr>
<th>Operator name and signature</th>
<th>Gamarc Vladimir Nikolaevich</th>
</tr>
</thead>
</table>

**Target date | 17.12.2016**

<table>
<thead>
<tr>
<th>Operator name and signature</th>
<th>Gamarc Vladimir Nikolaevich</th>
<th>Actual Completion date</th>
</tr>
</thead>
</table>

**Verification of Operator's corrective action and implementation by ET KO**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>YES □</th>
<th>NO □</th>
<th>Date</th>
<th>ETKO approval</th>
</tr>
</thead>
</table>

**Explanations:**
Dear Madam / Sir: Salamaha Vasily Dmitrievich  

Date: 17.11.2016

On the dates (08.09.2016) ETKO Inspector 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  NOPACAAverseActions@ams.usda.gov
**Notification of Noncompliance**

**3220F-04 Rodina**

<table>
<thead>
<tr>
<th>Non-compliances:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator unit no.</td>
</tr>
<tr>
<td>Unit name</td>
</tr>
<tr>
<td>Location - Adres</td>
</tr>
</tbody>
</table>

Initial Inspection | Surveillance Inspection | Report no 3220F-04.2016.ac |

<table>
<thead>
<tr>
<th>Subject of nonconformity</th>
<th>Documentation</th>
<th>Std or reg. nr. NOP 205.201(a2)</th>
<th>NCR No 2016.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspection Date</td>
<td>Date of Notification</td>
<td>Due Date</td>
<td></td>
</tr>
</tbody>
</table>

- □ Major
- ○ Minor M1-6.1, 7.7, 8.2

- □ Factors causing risk on the product
- □ Factors causing no risk on the condition of the product.
- □ Use of inputs which are not allowed by the regulations.
- □ Production process plan partly implemented.
- □ Non-Organic product sales as organic.
- □ Requirements of regulation or standard not applied
- □ Frequent minor non-conformities on the same requirement of regulation.
- □ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- □ Misuse of the licenses and certificates.
- □ Production process plan not implemented.

**Description of Nonconformity by Inspector**

§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.

<table>
<thead>
<tr>
<th>Inspector Name and signature</th>
<th>Operator name and signature</th>
<th>Salamaha Vasily Dmitrievich</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Corrective Action Plan by Operator**

Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.

<table>
<thead>
<tr>
<th>Target date</th>
<th>Operator name and signature</th>
<th>Salamaha Vasily Dmitrievich</th>
<th>Actual Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17.12.2016</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Verification of Operator’s corrective action and implementation by ETKO**

Accepted: YES □ NO □ Date ETKO approval

**Explanations:**
# Notification of Noncompliance

## 3220F-04 Rodina

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>3220F-04</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit name</td>
<td>Rodina</td>
</tr>
<tr>
<td>Location - Address</td>
<td>v.Plahrevka, Saratovsky district, Odessa region, Ukraine</td>
</tr>
</tbody>
</table>

### Report Information
- **Report no**: 3220F-04.2016.ac

### Subject of nonconformity
- **Date of Notification**: 08.09.2016
- **Due Date**: 17.12.2016
- **Decree No**: NOP 205.272a
- **NCR No**: 2016.2

<table>
<thead>
<tr>
<th>Description of Nonconformity by Inspector</th>
</tr>
</thead>
<tbody>
<tr>
<td>§205.272 Commingling and contact with prohibited substance prevention practice standard.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
<tr>
<td><strong>Issues</strong> - Crops are not marked in the storages. Storages are not marked as organic.</td>
</tr>
</tbody>
</table>

### Operator Name and Signature
- **Operator name and signature**: Salamaha Vasilii Dmitrievich

### Corrective Action Plan by Operator
- Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.

### Target Date and Completion
- **Target date**: 17.12.2016
- **Actual Completion date**: 

### Verification of Operator’s corrective action and implementation by ETKO
- **Accepted**: YES □ NO □
- **ETKO approval**: 

**Explanations:**
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  NOPACAAdverseActions@ams.usda.gov
Non-compliances:

<table>
<thead>
<tr>
<th>Operator unit no.</th>
<th>Unit name</th>
</tr>
</thead>
<tbody>
<tr>
<td>3188D-01</td>
<td>VIP Group</td>
</tr>
</tbody>
</table>

Location - Address: 9, Boryspilska str., Kyiv, Ukraine


Subject of nonconformity: Documentation

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>Report no 3188D-01.2016.ac</th>
</tr>
</thead>
<tbody>
<tr>
<td>07.10.2016</td>
<td>3188D-01.2016.ac</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
</table>

Factors causing risk on the product [ ] Factors causing no risk on the condition of the product. [ ]

Factors causing risk on the product:
- Use of inputs which are not allowed by the regulations.
- Non-Organic product sales as organic.
- Requirements of regulation or standard not applied.
- Frequent minor non-conformities on the same requirement of regulation.
- Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates.
- Production process plan not implemented.

Factors causing no risk on the condition of the product:
- Production process plan partly implemented.

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 plan must include:

(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;

Issue: A5.3 Registration form of complaints and register are presented but there is no complaint procedure

Inspector Name and signature [D (6), (C)]

Operator name and signature: Alexey Kachkovskiy

Corrective Action Plan by Operator

Target date: 12.11.2016

Actual Completion date

Verification of Operator’s corrective action and implementation by ETKO

Accepted: YES [ ] NO [ ] Date ETKO approval

Explanations:
## Notification of Noncompliance

### 3188D-01 VIP Group

### Operator unit no. 3188D-01

### Unit name VIP Group

### Location - Adres 9, Boryspilska str., Kyiv, Ukraine

### Initial Inspection  

### Surveillance Inspection  

### Report no 3188D-01.2016.ac

## Subject of nonconformity

<table>
<thead>
<tr>
<th>Documentation</th>
<th>Std or reg. Art. nr. NOP 205.272(a)</th>
<th>NCR No 2016.2</th>
</tr>
</thead>
</table>

### Inspection Date 07.10.2016

### Date of Notification 17.10.2016

### Due Date 17.11.2016

### □ Majör  

### ■ Minör

- □ Factors causing risk on the product  
  - □ Factors causing no risk on the condition of the product.
- □ Use of inputs which are not allowed by the regulations.
  - ■ Production process plan partly implemented.
- □ Non-Organic product sales as organic.
- □ Requirements of regulation or standard not applied
- □ Frequent minor non-conformities on the same requirement of regulation.
- □ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- □ Misuse of the licenses and certificates
- □ Production process plan not implemented.

### Description of Nonconformity by Inspector

§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.

**Issue:** A2.4 Instructions for transport companies about transportation organic goods are not in place

### Inspector Name and signature

| [7] (6), (6) (7)/(C) | Operator name and signature Alexey Kachkovski

### Corrective Action Plan by Operator

| Target date 12.11.2016 | Operator name and signature Alexey Kachkovski | Actual Completion date |

### Verification of Operator's corrective action and implementation by ETKO

| Accepted: YES □ | NO □ | Date | ETKO approval |

### Explanations:
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.

Saygilarımızla/ Best Regards

Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

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

Sagilarimizla/ 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from you system.

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

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

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

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):
Outstanding Non-compliances:
Operator unit no. 3188D-01  Unit name VIP Group
Location - Adres 9, Boryspilska str., Kyiv, Ukraine

Initial Inspection □  Surveillance Inspection ■  Report no 3188D-01.2016.ac

Subject of nonconformity  Documentation  Std or reg. Art. nr. NOP 205.201(a1)  NCR No 2016.1
Inspection Date 07.10.2016  Date of Notification 17.10.2016  Due Date 17.11.2016

□ Majör  ■ Minör
□ Factors causing risk on the product  □ Factors causing no risk on the condition of the product.
□ Use of inputs which are not allowed by the regulations.  ■ Production process plan partly implemented.
□ Non-Organic product sales as organic.
□ Requirements of regulation or standard not applied
□ Frequent minor non-conformities on the same requirement of regulation.
□ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
□ Misuse of the licenses and certificates
□ Production process plan not implemented.

Description of Nonconformity by Inspector
§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;
Issue: A5.3 Registration form of complaints and register are presented but there is no complaint procedure

Corrective Action Plan by Operator
Complaint procedure and registration form of complaints are to be sent.

Target date 17.11.2016  Operator name and signature Alexey Kachkovskiy  Actual Completion date 12.12.2016

Verification of Operator’s corrective action and implementation by ETKO
Accepted: YES ■  NO □  Date 19.12.2016  ETKO approval Mustafa AKYÜZ

Complaint procedure and registration form of complaints were provided. (See Annex-3)
Notification of Noncompliance
3188D-01 VIP Group

Operator unit no. 3188D-01  Unit name VIP Group
Location - Adres 9, Boryspilska str., Kyiv, Ukraine

Initial Inspection  □  Surveillance Inspection  ■  Report no 3188D-01.2016.ac

Subject of nonconformity  Documentation  Std or reg. Art. nr. NOP 205.272(a)  NCR No 2016.2
Inspection Date 07.10.2016  Date of Notification 17.10.2016  Due Date 17.11.2016

□ Majör  ■ Minör

□ Factors causing risk on the product  □ Factors causing no risk on the condition of the product.
□ Use of inputs which are not allowed by the regulations.  ■ Production process plan partly implemented.
□ Non-Organic product sales as organic.
□ Requirements of regulation or standard not applied
□ Frequent minor non-conformities on the same requirement of regulation.
□ Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
□ Misuse of the licenses and certificates
□ Production process plan not implemented.

Description of Nonconformity by Inspector

§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.
Issue: A2.4 Instructions for transport companies about transportation organic goods are not in place.

Inspector Name and signature  [ ] (6), (7)(C)  Operator name and signature Alexey Kachkovskiy

Corrective Action Plan by Operator

Instructions for transport companies about transportation organic goods are to be sent.

Target date 17.11.2016  Operator name and signature Alexey Kachkovskiy  Actual Completion date 12.12.2016

Verification of Operator's corrective action and implementation by ETKO

Accepted: YES  ■  NO  □  Date 19.12.2016  ETKO approval Mustafa AKYÜZ
Explanations: Instructions for transport companies about transportation organic goods and a Declaration on this issue were provided. (See Annex 1 and 2)
Dear Madam / Sir: Shuli Pavlo

Date: 01.06.2016

On the dates (12-13.05.2016) ETKO 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 of 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
110 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. Muhammed Yulun from ETKO +90-232-3397606 or by email at: mu@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team
## Notification of Noncompliance

**3216F-04 Volyn Agro**

### Noncompliance:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>12-13.05.2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Notification</td>
<td>01.06.2016</td>
<td>Due Date</td>
<td>01.07.2016</td>
<td></td>
</tr>
</tbody>
</table>

**$205.204$ Seeds and planting stock practice standard:**

1. The producer must use organically grown seeds, annual seedlings, and planting stock. Exempt. This:
2. 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. Exempt. This, organically produced seed must be used for the production of edible sprouts.

There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)

**Inspection criteria**

<table>
<thead>
<tr>
<th>NOP reg. ref</th>
<th>205.204(1)</th>
<th>ETKO rules ref.</th>
<th>834-Article 9, IACB 5.9</th>
</tr>
</thead>
</table>

**Action taken**

Suppliers of seeds declared that their seeds are not GMO (see vendor declarations).

**Please identify the supporting documents, if any:** 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b) (6)</td>
<td>05.06.2016</td>
</tr>
</tbody>
</table>

**Review Date**

- Resolved
- Unresolved

**Review Comment:**

**Reviewer name & signature:**

---

---
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.

Saygılarımızla/ Best Regards
Ceren BAYAZIT

ETKO Ekolojik Tarım 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

This email and any files transmitted with it are confidential and may be protected by legal privilege. If you are not the intended recipient you should not read, copy, re-transmit, use and disclose any information in this email or any files transmitted with it. Please return it to the sender immediately and delete your copy from your system.

Please help to save the planet and only print this email if you really need to. Thank you.
Dear Madam / Sir: Shum Pavlo Mykolajovych  

Date: 18.08.2016

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: NOPACAAVERSEActions@ams.usda.gov

**Result of Evaluation:**

- Closed noncompliance: 1
  
  NC number(s): 1. See below forms

- Outstanding noncompliance: None
  
  NC number(s):
Resolved Noncompliances:

<table>
<thead>
<tr>
<th>Noncompliance No</th>
<th>Major</th>
<th>Minor</th>
<th>Inspection Date</th>
<th>Date of Notification</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>☐</td>
<td>☑</td>
<td>12-13.05.2016</td>
<td>01.06.2016</td>
<td>01.07.2016</td>
</tr>
</tbody>
</table>

(a) The producer must use organically grown seeds, annual seedlings, 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 variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;

There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)

<table>
<thead>
<tr>
<th>Inspection criteria</th>
<th>NOP reg. ref</th>
<th>205.204a(1)</th>
<th>ETKO rules ref.</th>
<th>834-Article 9, IACB 5.9</th>
</tr>
</thead>
</table>

Action taken: Suppliers of seeds declared that their seeds are not GMO (see vendor declarations).

Please identify the supporting documents, if any: 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed

<table>
<thead>
<tr>
<th>Name, Surname and Signature of Appl. Resp.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shum Pavlo Mykolajovych</td>
<td>05.06.2016</td>
</tr>
</tbody>
</table>

Review Date: 18.08.2016

Resolved ☑

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
Mann, Renee - AMS 3:31 PM:

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
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!
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
( clarifyation - 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. ;-)
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/soCcXCvf6XdI5Uf
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)
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 be 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.
**Acknowledgement: Your message has been sent**
RPost will send a Registered Receipt™ record within two hours as your proof of delivery, content, and official time.

This message certifies that:

<table>
<thead>
<tr>
<th>Your message (subject):</th>
<th>Annual Report Acknowledgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>To:</td>
<td>&quot;<a href="mailto:ma@etko.org">ma@etko.org</a>&quot;</td>
</tr>
<tr>
<td>Cc:</td>
<td></td>
</tr>
<tr>
<td>Was received by the registration service at:</td>
<td>3/10/2014 2:38:37 PM (UTC)*</td>
</tr>
<tr>
<td></td>
<td>3/10/2014 2:38:37 PM (Local)</td>
</tr>
<tr>
<td>Message ID:</td>
<td>0B11EC5FE152E3C437B23769591DB68DD61AB49E</td>
</tr>
<tr>
<td>Network ID:</td>
<td>&lt;<a href="mailto:3C4DB283706AA94CB746BB337C77BE7430FB75@001FSN2MPN1-043.001f">3C4DB283706AA94CB746BB337C77BE7430FB75@001FSN2MPN1-043.001f</a></td>
</tr>
<tr>
<td>Client Code:</td>
<td></td>
</tr>
</tbody>
</table>

* UTC represents Coordinated Universal Time.

**Note:** Bcc addresses will be included in your Registered Receipt email. Messages will have been only transmitted to recipient addresses indicated in the Registered Receipt email.

**Service Language Preference:**

<table>
<thead>
<tr>
<th>English</th>
<th>Français</th>
<th>Deutsch</th>
<th>Español</th>
<th>Português</th>
<th>Nederlands</th>
<th>Русский</th>
<th>Indonesian</th>
</tr>
</thead>
</table>

For more information about RPost services, visit [www.rpost.com](http://www.rpost.com).
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.
NOTICE OF ANNUAL REPORT

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 Courtney
Director, Accreditation and International Activities
National Organic Program
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, Bangladesh, Cote D’Ivoire, Cyprus, Egypt, Ethiopia, Georgia, India, Kazakhstan, Kirgizia, Korea, Pakistan, Romania, Russia, Serbia, Singapur, Tajikistan, 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 Crosetiere

From: 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 forgotten, the client is certified. Yellow color shall have been cleaned, but forgotten

Have a nice weekend,

Mustafa Akyuz
<table>
<thead>
<tr>
<th>No</th>
<th>License number</th>
<th>Name client</th>
<th>Area Certification</th>
<th>Nr of Handlers</th>
<th>Nr of Producers</th>
<th>Nr of Collectors</th>
<th>Date of Certification 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>2044</td>
<td>Arif Gurdal – TURKEY</td>
<td>Crops</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>30.10.2014</td>
</tr>
<tr>
<td>6</td>
<td>2120</td>
<td>Treko – TURKEY</td>
<td>Processing &amp; crops</td>
<td>1</td>
<td>360</td>
<td>-</td>
<td>20.11.2014</td>
</tr>
<tr>
<td>10</td>
<td>2314</td>
<td>Fine Food – TURKEY</td>
<td>Processing &amp; crops</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>02.05.2014</td>
</tr>
<tr>
<td>12</td>
<td>2387</td>
<td>Ares – TURKEY</td>
<td>Processing</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>31.07.2014</td>
</tr>
<tr>
<td>16</td>
<td>2484</td>
<td>Meysinl - TURKEY</td>
<td>Processing</td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>26.09.2014</td>
</tr>
<tr>
<td>18</td>
<td>2516</td>
<td>Ann Gida - TURKEY</td>
<td>Trade</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>01.11.2014</td>
</tr>
<tr>
<td>19</td>
<td>2527</td>
<td>Limkon- TURKEY</td>
<td>Processing</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>20.11.2014</td>
</tr>
<tr>
<td>20</td>
<td>2534</td>
<td>WBT - TURKEY</td>
<td>Processing</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>05.04.2014</td>
</tr>
<tr>
<td>21</td>
<td>2542</td>
<td>Ekolunak-TURKEY</td>
<td>Processing</td>
<td>2</td>
<td>21</td>
<td>-</td>
<td>18.02.2014</td>
</tr>
<tr>
<td>22</td>
<td>2573</td>
<td>Egefer biy-TURKEY</td>
<td>Crops</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>15.08.2014</td>
</tr>
<tr>
<td>24</td>
<td>2633</td>
<td>Ason-TURKEY</td>
<td>Processing</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>13.05.2014</td>
</tr>
<tr>
<td>26</td>
<td>2654</td>
<td>Nigella-TURKEY</td>
<td>Processing</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>07.11.2014</td>
</tr>
<tr>
<td>29</td>
<td>3013</td>
<td>Aleg Ltd</td>
<td>Trade</td>
<td>-</td>
<td>10</td>
<td>-</td>
<td>15.12.2014</td>
</tr>
<tr>
<td>30</td>
<td>3020</td>
<td>Region Agro ltd.</td>
<td>Trade</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>20.10.2014</td>
</tr>
<tr>
<td>31</td>
<td>3026</td>
<td>Sibnut – RUSSIAAA</td>
<td>Processing and wild collection</td>
<td>2</td>
<td>-</td>
<td>15</td>
<td>23.10.2014</td>
</tr>
<tr>
<td>33</td>
<td>3077</td>
<td>TOO “PROIZVODSTVENNIY KOMPLEX ‘MOL-TABYS’”</td>
<td>Trade</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>31.12.2014</td>
</tr>
<tr>
<td>34</td>
<td>3087</td>
<td>Yukeketop – UKRAINE</td>
<td>Processing and crops</td>
<td>15</td>
<td>11</td>
<td>1</td>
<td>31.12.2014</td>
</tr>
<tr>
<td>35</td>
<td>3090</td>
<td>EVERI LTD</td>
<td>Trade</td>
<td>-</td>
<td>9</td>
<td>-</td>
<td>15.05.2014</td>
</tr>
<tr>
<td>36</td>
<td>3092</td>
<td>GRAINAGRO LTD</td>
<td>Trade</td>
<td>-</td>
<td>8</td>
<td>-</td>
<td>09.12.2014</td>
</tr>
<tr>
<td>37</td>
<td>3093</td>
<td>Dnepr2 – UKRAINE</td>
<td>Trade</td>
<td>-</td>
<td>12</td>
<td>-</td>
<td>05.10.2014</td>
</tr>
<tr>
<td>38</td>
<td>3094</td>
<td>Polba – UKRAINE</td>
<td>Trade</td>
<td>-</td>
<td>4</td>
<td>-</td>
<td>30.12.2014</td>
</tr>
<tr>
<td>License number</td>
<td>Name Operator</td>
<td>Comment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------</td>
<td>--------------------------------</td>
<td>-----------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3132</td>
<td>RODINA Llc.</td>
<td>Surrendered</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3138</td>
<td>DAEHAN FEED</td>
<td>Surrendered</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**ETKO Sanctioned & Surrendered operations in 2014 season**
### Name, address of operators production and processing units and products

#### 1- 2009 ARISU

**Processing units**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dis Ticaret A.S.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Products from other project**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Expected or realized harvest (ton)</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009P-01</td>
<td>Apricot</td>
<td>Fresh</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-02</td>
<td>Apple</td>
<td>Co</td>
<td>IC 1</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-03</td>
<td>Apple</td>
<td>Co</td>
<td>IC 2</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-04</td>
<td>Apple</td>
<td>Co</td>
<td>IC 3</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-05</td>
<td>Apple</td>
<td>Co</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-06</td>
<td>Strawberry</td>
<td>Co</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-07</td>
<td>Cherry</td>
<td>Co</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-08</td>
<td>Plum</td>
<td>Pu</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
<tr>
<td>2009P-09</td>
<td>Pomegranate</td>
<td>NFC, JU</td>
<td>Org</td>
<td></td>
<td>2009D-01</td>
</tr>
</tbody>
</table>

AR: Aroma, Co: Concentrate, Pu: Puree Ju: Juice

#### 2-2014 MEZO

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014F-10</td>
<td>Tefenni / BURDUR</td>
<td>7 üretici, [D] (4) ha. rezene, anason, fiğ, nohut, buğday, arpa</td>
<td>Org</td>
</tr>
<tr>
<td>2014F-10</td>
<td>Tefenni / BURDUR</td>
<td>3 üretici, [D] (4) ha. rezene, anason, arpa, şeker pancarı,  slajlık misir, hıyar, domates, biber</td>
<td>IC2</td>
</tr>
<tr>
<td>2014F-04</td>
<td>Antalya, Burdur, Mersin</td>
<td>7 üretici, Doğal toplama</td>
<td>Org</td>
</tr>
</tbody>
</table>
## Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014P-01</td>
<td>Fennel</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-02</td>
<td>Wheat</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-03</td>
<td>Vetch</td>
<td>Dry ot</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-04</td>
<td>Barley</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-05</td>
<td>Chickpea</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-06</td>
<td>Anise</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-07</td>
<td>Ball Oregano - Oregano</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-08</td>
<td>Thyme - Savory</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-09</td>
<td>Sage</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-10</td>
<td>Bay</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-12</td>
<td>Myrtle leaf</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-13</td>
<td>Sumac</td>
<td>Dane</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-14</td>
<td>Carrageenan</td>
<td>Dry Leaves</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
<tr>
<td>2014P-16</td>
<td>Locust</td>
<td>Fruit</td>
<td>Organic</td>
<td>2014D-01</td>
</tr>
</tbody>
</table>

## 3-ARIF GURDAL

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2044F-01</td>
<td>AG Organic Farm Facility Aydin Baltaköy</td>
<td>1 producer, 10 ha. Crops: Pomegranate.</td>
<td>Organic</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>
### Products

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2044P-01</td>
<td>Pomegranate</td>
<td>Fresh</td>
<td>ORG</td>
<td>2044D-01</td>
</tr>
<tr>
<td>2044P-02</td>
<td>Pomegranate</td>
<td>Fresh</td>
<td>In-Con</td>
<td>2044D-01</td>
</tr>
</tbody>
</table>

### 4-ETAP GIDA

#### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

#### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>None</td>
</tr>
</tbody>
</table>

### Products

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2058P-01</td>
<td>Apple</td>
<td>Juice concentrate, puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-02</td>
<td>Apricot</td>
<td>Puree, 20-22 bx, 30-32 bx</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-03</td>
<td>Banana</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-04</td>
<td>Black carrot</td>
<td>Juice concentrate</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-05</td>
<td>Blackberry</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-06</td>
<td>Black mulberry</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-07</td>
<td>Fig</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-08</td>
<td>Grape</td>
<td>Juice</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-09</td>
<td>Grapefruit</td>
<td>Juice concentrate, cloudy conc., peel oil and cell</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-10</td>
<td>Lemon</td>
<td>Juice concentrate, cloudy conc., peel oil and cell</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-11</td>
<td>Mandarin</td>
<td>Juice concentrate</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-12</td>
<td>Orange</td>
<td>Juice concentrate, cloudy conc., comminuted, peel oil and cell</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-13</td>
<td>Peach</td>
<td>Puree, 20-22 bx, 30-32 bx</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-14</td>
<td>Pear</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-15</td>
<td>Plum</td>
<td>Puree, 20-22 bx, 30-32 bx</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>Product nr</td>
<td>Product</td>
<td>Final product</td>
<td>Status</td>
<td>Processing unit</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>---------------</td>
<td>-----------</td>
<td>-----------------</td>
</tr>
<tr>
<td>2058P-11</td>
<td>Okra</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-12</td>
<td>Tomato</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-13</td>
<td>Raspberry</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-14</td>
<td>Red beet</td>
<td>Juice concentrate</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-15</td>
<td>Sour cherry</td>
<td>Concentrate, puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-16</td>
<td>Strawberry</td>
<td>Puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-17</td>
<td>Sour cherry</td>
<td>Concentrate, puree</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-18</td>
<td>Pomegranate</td>
<td>Juice, Concentrate</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-19</td>
<td>Blackberry</td>
<td>Fresh</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-20</td>
<td>Grapes</td>
<td>Fresh</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2058P-21</td>
<td>Mulberry (Black-white)</td>
<td>Fresh</td>
<td>Organic</td>
<td>2058D-01</td>
</tr>
<tr>
<td>2070P-01</td>
<td>Almonds</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-02</td>
<td>Apple</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-03</td>
<td>Apricot</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-04</td>
<td>Bell pepper</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-05</td>
<td>Blackberry</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-06</td>
<td>Celery</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-07</td>
<td>Cherry</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-08</td>
<td>Cucumber</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-09</td>
<td>Eggplant</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-10</td>
<td>Garlic</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-11</td>
<td>Golden berry</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-12</td>
<td>Grapes</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-13</td>
<td>Leek</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-14</td>
<td>Melon</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-15</td>
<td>Mulberry (Black-white)</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-16</td>
<td>Okra</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-17</td>
<td>Onion</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-18</td>
<td>Parsley</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-19</td>
<td>Peach</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-20</td>
<td>Pears</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-21</td>
<td>Pepper</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-22</td>
<td>Plum</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-23</td>
<td>Potato</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-24</td>
<td>Pumpkin</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-25</td>
<td>Quince</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-26</td>
<td>Raspberries</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-27</td>
<td>Red Pepper</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-28</td>
<td>Sour Cherry</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-29</td>
<td>Squash</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-30</td>
<td>Tomato</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-31</td>
<td>Walnut</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
<tr>
<td>2070P-32</td>
<td>Watermelon</td>
<td>Fresh</td>
<td>Organic</td>
<td>----</td>
</tr>
</tbody>
</table>

6- 2120 TREKO

Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

Production unit:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2120F-04</td>
<td>Çankırı</td>
<td>267 farmers , 67.61 Hectares Apple productions</td>
<td>Organic</td>
</tr>
<tr>
<td>2120F-05</td>
<td>Alaşehir</td>
<td>104 farmers , 67.61 Hectares Apple productions</td>
<td>Organic</td>
</tr>
<tr>
<td>2120F-06</td>
<td>Çine</td>
<td>13 farmers , 67.61 Hectares Apple productions</td>
<td>Organic</td>
</tr>
</tbody>
</table>

Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2120P-01</td>
<td>Apple</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2120D-02</td>
</tr>
<tr>
<td>2120P-02</td>
<td>Pears</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2120D-02</td>
</tr>
<tr>
<td>2120P-03</td>
<td>Quince</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-04</td>
<td>Pomegranate</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-05</td>
<td>Grapefruit</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-06</td>
<td>Orange</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-07</td>
<td>Lemon</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-08</td>
<td>Mandarin</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-09</td>
<td>Carrots</td>
<td>Concentrate, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-10</td>
<td>Black Carrots</td>
<td>Concentrate, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-11</td>
<td>Strawberry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-12</td>
<td>Sour Cherry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-13</td>
<td>Cherry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-14</td>
<td>Tomato</td>
<td>Concentrate, Puree, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-15</td>
<td>Apricot</td>
<td>Concentrate, Puree, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
<tr>
<td>2120P-16</td>
<td>Peaches</td>
<td>Concentrate, Puree, Aroma</td>
<td>2120D-02</td>
<td></td>
</tr>
</tbody>
</table>

### 7-SUSİTAŞ

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2158F-01</td>
<td>Manisa</td>
<td>[b] (4) ha, capers, 4 chief collectors</td>
<td>Org</td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2158P-01</td>
<td>Capers</td>
<td>*Canned (in jars, tins, pet buckets, gallons, barrels)</td>
<td>Org</td>
<td>2158D-01</td>
</tr>
</tbody>
</table>
### 8-2190 ASYA MEYVE SULARI

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2190D-01</td>
<td>Asya Meyve Suyu ve Gıda Sanayi A.Ş.</td>
<td>Processing of Fruit juice concentrate and puree</td>
<td>Tepeli Köyü Mevkii – Eğirdir / ISPARTA</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2190P-01</td>
<td>Apple</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-02</td>
<td>Apple</td>
<td>Puree</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-03</td>
<td>Sour Cherry</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-04</td>
<td>Pomegranate</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-05</td>
<td>Peach</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-06</td>
<td>Peach</td>
<td>Puree</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-07</td>
<td>Apricot</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-08</td>
<td>Apricot</td>
<td>Puree</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-09</td>
<td>Strawberry</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-10</td>
<td>Strawberry</td>
<td>Puree</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-11</td>
<td>Black carrot</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-12</td>
<td>Pear</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-13</td>
<td>Quince</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-14</td>
<td>Plum</td>
<td>Puree</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
<tr>
<td>2190P-15</td>
<td>Cherry</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2190D-01</td>
</tr>
</tbody>
</table>

### 9-2203 KALKAN

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>
Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2203F-01</td>
<td>Akşehir-Konya / TURKEY</td>
<td>74 producers, fruits production</td>
<td>Organic</td>
</tr>
</tbody>
</table>

Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2203P-01</td>
<td>Strawberry</td>
<td>Fresh, IQF</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-02</td>
<td>Cherry</td>
<td>Fresh, IQF</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-03</td>
<td>Sour cherry</td>
<td>Fresh, IQF</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-04</td>
<td>Apple</td>
<td>Fresh</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-05</td>
<td>Pear</td>
<td>Fresh</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-06</td>
<td>Plum</td>
<td>Fresh</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
<tr>
<td>2203P-07</td>
<td>Grape</td>
<td>Fresh</td>
<td>Organic</td>
<td>2203D – 01</td>
</tr>
</tbody>
</table>
### 10- 2314 FİNEFOOD

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Omitted Activity – Material</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>2314D-02</td>
<td>Fine Food A.Ş.</td>
<td>Processing (IQF), marketing, documentation, organization</td>
<td>Conventional Processing (IQF)</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2314F-01</td>
<td>Fine Food A.Ş.</td>
<td>1 producer, 1 ha. Crops: Peas Organic</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 producer, 1 ha. Crops: Beans Organic</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 producer, 1 ha. Crops: Pepper CW Organic</td>
<td></td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2314P-01</td>
<td>Broccoli</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-02</td>
<td>Capia Pepper</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-03</td>
<td>Cherry</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-04</td>
<td>Corn</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-05</td>
<td>Green Pepper</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-06</td>
<td>Onions</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-07</td>
<td>Peas</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-08</td>
<td>Sour cherry</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-09</td>
<td>Strawberry</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
<tr>
<td>2314P-10</td>
<td>Tomatoes</td>
<td>IQF</td>
<td>Organic</td>
<td>2314D-01</td>
</tr>
</tbody>
</table>

### 11- 2328 TASKIN TARIM

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2328D-01</td>
<td>Taşkin Tarım</td>
<td>Processing (Drying), Packing, Storing, Marketing and Export of Organic Fruits</td>
<td>Gediz – Kütahya</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2328F-01</td>
<td>Kütahya</td>
<td>14 producers, 140 ha fruit productions</td>
<td>Organic</td>
</tr>
</tbody>
</table>
## Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2328P-01</td>
<td>Pear</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-02</td>
<td>Quince</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-03</td>
<td>Almond</td>
<td>Shelled</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-04</td>
<td>Walnut</td>
<td>Shelled</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-05</td>
<td>Tomatoes</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-06</td>
<td>Apple</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-07</td>
<td>Plum</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-08</td>
<td>Figs</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-09</td>
<td>Apricot</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-10</td>
<td>Cherry</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-11</td>
<td>Rosehip</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-12</td>
<td>Lemon</td>
<td>Dried (skin or fruit)</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-13</td>
<td>Orange</td>
<td>Dried (skin or fruit)</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-14</td>
<td>Peach</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-15</td>
<td>Sour orange</td>
<td>Dried (skin or fruit)</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-16</td>
<td>Grape</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
<tr>
<td>2328P-17</td>
<td>Sour cherry</td>
<td>Dried</td>
<td>Organic</td>
<td>2328D-01</td>
</tr>
</tbody>
</table>

*: Products will be bought from other projects as certified

## 12-2387 ARES

### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectare and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2387D-01</td>
<td>ARES ORGANİK GIDA TEK. SAN. Ve DIŞ TIC. LTD. ŞTİ.</td>
<td>Documentation, Marketing</td>
<td>Alıntıtepe Mah. İstasyon yolu sok. No:3 Maltepe/İSTANBUL - TURKEY</td>
</tr>
<tr>
<td>Product no</td>
<td>Name product</td>
<td>Last product</td>
<td>Status</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------</td>
<td>---------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>2387P-01</td>
<td>Anise</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-02</td>
<td>Apple</td>
<td>Dried</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-03</td>
<td>Apricot</td>
<td>IQF, Dried, Kernel, Halves in (Water with syrup), Jam</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-04</td>
<td>Black Cherry (Red, Dark)</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-05</td>
<td>Blackberries</td>
<td>IQF, Jam</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-06</td>
<td>Blueberry</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-07</td>
<td>Bouilghour</td>
<td>Grain</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-08</td>
<td>Broccoli</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-09</td>
<td>Carrot</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-10</td>
<td>Chestnut</td>
<td>Dried</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-11</td>
<td>Chickpeas</td>
<td>Pulses</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-12</td>
<td>Cumin</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-13</td>
<td>Fennel</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-14</td>
<td>Figs</td>
<td>Dried, Jam</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-15</td>
<td>Grapefruit</td>
<td>Segment in juice/syrup</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-16</td>
<td>Green lentil</td>
<td>Grain</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-17</td>
<td>Hazelnut</td>
<td>Dried</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-18</td>
<td>Laurel</td>
<td>Leaves</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-19</td>
<td>Leek</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-20</td>
<td>Linden</td>
<td>Leaves, Flowers</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-21</td>
<td>Mahleb</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-22</td>
<td>Mandarin</td>
<td>Segment in juice/syrup</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-23</td>
<td>Mint</td>
<td>Leaves</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-24</td>
<td>Nigella</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-25</td>
<td>Olive</td>
<td>Oil, Seedless, Pepper, Almond, Jam, Paste</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-26</td>
<td>Onion</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-27</td>
<td>Orange</td>
<td>Segment in juice/syrup</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-28</td>
<td>Oregano</td>
<td>Seed</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-29</td>
<td>Paper (Red, Yellow, Green)</td>
<td>IQF</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-30</td>
<td>Peach</td>
<td>IQF, Jam</td>
<td>Organic</td>
</tr>
<tr>
<td>2387P-31</td>
<td>Pear</td>
<td>IQF</td>
<td>Organic</td>
</tr>
</tbody>
</table>
### 13- 2391 Vahap Baran BAYDOĞAN

**Agricultural units**

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectare and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2391F-01 Vahap Baran Baydoğan</td>
<td>1 Producer, 4 da, Olive Cultivation</td>
<td>Organic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 Producer, 1 da, Olive Cultivation</td>
<td>IC 3</td>
<td></td>
</tr>
</tbody>
</table>

**Processing units**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2391D-01</td>
<td>ARES ORGANIK GIDA TEK. SAN. Ve DIŞ TIC. LTD. ŞTİ.</td>
<td>Documentation, Marketing</td>
<td>Alhtintepe Mah. İstasyon yolu sok. No:3 Maltepe/İSTANBUL - TURKEY</td>
</tr>
</tbody>
</table>

**Products**

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2391P-01</td>
<td>Olive</td>
<td>Fresh</td>
<td>Organic</td>
<td>2387D-01</td>
</tr>
<tr>
<td>2391P-02</td>
<td>Olive Oil</td>
<td>Olive Oil</td>
<td>Organic</td>
<td>2387D-01</td>
</tr>
</tbody>
</table>

### 14- 2453 OLİVA GİDA

**Agricultural units**

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectare and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2453F-01 Çine-AYDIN</td>
<td>4 da, Zeytin</td>
<td>Geçiş 2</td>
<td></td>
</tr>
<tr>
<td>2453F-02 Çine-AYDIN</td>
<td>4 da, Zeytin</td>
<td>Geçiş 3</td>
<td></td>
</tr>
</tbody>
</table>

**Processing units**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2453D-01</td>
<td>OLİVA GİDA</td>
<td>Yıkama, Kırma, Ayırma, Stoklama, Paketleme, Dokümantasyon, satış</td>
<td>İzmir Yolu Üzeri 4. km.Gaye Sanayi Sitesi Karşısı Söke-AYDIN</td>
</tr>
</tbody>
</table>

**Products**

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2453P-01</td>
<td>Olive</td>
<td>Olive Oil</td>
<td>IC2</td>
<td>2453D-01</td>
</tr>
<tr>
<td>2453P-02</td>
<td>Olive</td>
<td>Olive Oil</td>
<td>IC3</td>
<td>2453D-01</td>
</tr>
</tbody>
</table>
## 15-2475 MEYSAN

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>26 Producers, (b) (4) da, Figs</td>
<td>Organic</td>
</tr>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>10 Producers, (b) (4) da, Figs</td>
<td>IC 2</td>
</tr>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>14 Producers, (b) (4) da, Walnut</td>
<td>Organic</td>
</tr>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>7 Producers, (b) (4) da, Walnut</td>
<td>IC 2</td>
</tr>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>23 Producers, (b) (4) da, Olive</td>
<td>Organic</td>
</tr>
<tr>
<td>2475F-01</td>
<td>TIRE</td>
<td>4 Producers, (b) (4) da, Olive</td>
<td>IC 2</td>
</tr>
<tr>
<td>2475F-02</td>
<td>MALATYA</td>
<td>11 Producers, (b) (4) da, Apricots</td>
<td>Organic</td>
</tr>
<tr>
<td>2475F-02</td>
<td>MALATYA</td>
<td>3 Producers, (b) (4) da, Apricots</td>
<td>IC 3</td>
</tr>
<tr>
<td>2475F-02</td>
<td>MALATYA</td>
<td>5 Producers, (b) (4) da, Apricots</td>
<td>IC 2</td>
</tr>
<tr>
<td>2475F-02</td>
<td>MALATYA</td>
<td>6 Producers, (b) (4) da, Apricots</td>
<td>IC 1</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2475D-01</td>
<td>MEY-SAN ORGANİK GIDA TARIM ÜRÜNLERİ SAN. TİC. LTD. ŞTİ.</td>
<td>Processing, marketing, documentation, organization</td>
<td>Sarıoğlu Mah. Otuç 1 sok, Kayısı İhracatçıları İş Merkezi No: 43, Malatya</td>
</tr>
<tr>
<td>2475D-02</td>
<td>BAŞARAN TARIM ÜRÜNLERİ TİC. LTD.ŞTİ.</td>
<td>Processing, documentation,</td>
<td>Ayfer Sok. No:13 Ege Serbest Bölgesi Gaziemir-İZMİR</td>
</tr>
<tr>
<td>2475D-03</td>
<td>MAMUR (KAYIȘI ÇEKİRDEK ALIM VE İŞLEMESİ)</td>
<td>Processing, documentation,</td>
<td>Yaşmuru mah. Akçadağ-MALATYA</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2475P-01</td>
<td>Figs</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-02</td>
<td>Walnut</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-04</td>
<td>Chestnut</td>
<td>Fresh</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-05</td>
<td>Olive</td>
<td>Fresh</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-12</td>
<td>Apricots</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-13</td>
<td>Apricot Kernels</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-14</td>
<td>Raisins*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-15</td>
<td>Apricots**</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-16</td>
<td>Diced Apricots**</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>Product Code</td>
<td>Description</td>
<td>Form</td>
<td>Certification</td>
<td>Batch Numbers</td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------------</td>
<td>------</td>
<td>--------------</td>
<td>---------------</td>
</tr>
<tr>
<td>2475P-17</td>
<td>Apricot Paste*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-18</td>
<td>Figs**</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-19</td>
<td>Diced Figs**</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-20</td>
<td>Dried Fig Paste **</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-21</td>
<td>Dried Mulberries*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-22</td>
<td>Dried Sour Cherry *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-23</td>
<td>Sultana Raisins (Dipped)*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02, 03</td>
</tr>
<tr>
<td>2475P-24</td>
<td>Sultana Raisins* (Undipped))</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02, 03</td>
</tr>
<tr>
<td>2475P-25</td>
<td>Dried Tomatoes*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-26</td>
<td>Dried Plums *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-27</td>
<td>Dried Plum Paste *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-28</td>
<td>Fruit Mix *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-29</td>
<td>Dried Apples *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-30</td>
<td>Dried Peach *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-31</td>
<td>Chickpeas*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-32</td>
<td>Red Lentils *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-33</td>
<td>Green Lentils*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-34</td>
<td>Beans*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-35</td>
<td>Bulgur*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-36</td>
<td>Apricot Kernels **</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-37</td>
<td>Apricot Kernel Oil *</td>
<td>Yağ (Oil)</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-38</td>
<td>Hazelnut Kernels *</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-39</td>
<td>Roasted Hazelnut Kernels*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-40</td>
<td>Hazelnut Kernels Powder*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-41</td>
<td>Pistachios*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-42</td>
<td>Pine nut*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-43</td>
<td>Almond*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-44</td>
<td>Chestnut*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-45</td>
<td>Blue Poppy Seads*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-46</td>
<td>White Poppy Seads*</td>
<td>Dried</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-47</td>
<td>IQF Strawberries*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-48</td>
<td>IQF Sweet Cherries*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-49</td>
<td>IQF Apricots*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-50</td>
<td>IQF Plums*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-51</td>
<td>IQF Sour Cherries*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-52</td>
<td>IQF Peaches*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>Product nr</td>
<td>Product</td>
<td>Final product</td>
<td>Status</td>
<td>Processing unit</td>
</tr>
<tr>
<td>------------</td>
<td>---------------</td>
<td>------------------------</td>
<td>-----------</td>
<td>-----------------</td>
</tr>
<tr>
<td>2475P-53</td>
<td>IQF Raspberry*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-54</td>
<td>IQF Tomatoes*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-55</td>
<td>IQF Red Pepper*</td>
<td>Frozen</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-56</td>
<td>Apple Juice Concentrate*</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-57</td>
<td>Sour Cherry Juice Concentrate*</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-58</td>
<td>Pomegranate Juice **Concentrate</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-59</td>
<td>Pear Juice Concentrate*</td>
<td>Concentrate</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-60</td>
<td>Apricot Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-61</td>
<td>Apple Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-62</td>
<td>Peach Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-63</td>
<td>Pear Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-64</td>
<td>Strawberry Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-65</td>
<td>Plum Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-66</td>
<td>Cherry Puree*</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
<tr>
<td>2475P-67</td>
<td>Raspberry Puree *</td>
<td>Puree</td>
<td>Organic</td>
<td>2475D-01, 02</td>
</tr>
</tbody>
</table>

16- 2484 MEYSÜT

Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2484D-02</td>
<td>GKM Gıda Maddleri Sanayi Tic. Ltd. Şti</td>
<td>Processing, storing, organization, documentation</td>
<td>Dumlupinar mah 1522 sok No 2 Göknan Apt. Kat ¼ MERSIN</td>
</tr>
</tbody>
</table>

Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>

Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2484P-01</td>
<td>Carob Fruit</td>
<td>Locust Bean Gum</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-02</td>
<td>Carob Fruit</td>
<td>Kibbled Carob Cubes</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-03</td>
<td>Carob Fruit</td>
<td>Carob Germ</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-04</td>
<td>Carob Fruit</td>
<td>Toasted Carob Powder</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-05</td>
<td>Carob Fruit</td>
<td>Carob Molasses</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-06</td>
<td>Carob Fruit</td>
<td>Clear Carob Syrup</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
<tr>
<td>2484P-07</td>
<td>Carob Fruit</td>
<td>Carob Fiber</td>
<td>Organic</td>
<td>2484D-02</td>
</tr>
</tbody>
</table>
### 17-2508 KALKAN TARIM

**Processing unit:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2508D-01</td>
<td>Kalkan organik Ltd. Şti.</td>
<td>Processing, Production, Documentation, Marketing</td>
<td>Nazilli - Aydın TURKIYE</td>
</tr>
</tbody>
</table>

**Agriculturel units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2508F-01</td>
<td>Kalkan organik Ltd. Şti.</td>
<td>11 Producers, ha, Olive, Fig, Chestnut</td>
<td>Organic</td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2508P-01</td>
<td>Figs</td>
<td>Dried</td>
<td>Organic</td>
<td>2508D-01</td>
</tr>
<tr>
<td>2508P-02</td>
<td>Apricots</td>
<td>Dried</td>
<td>Organic</td>
<td>2508D-01</td>
</tr>
</tbody>
</table>

### 18-2516 ARIN GIDA

**Processing units:**

<table>
<thead>
<tr>
<th>Unite numarası</th>
<th>Unite</th>
<th>Proses</th>
<th>Adres</th>
</tr>
</thead>
<tbody>
<tr>
<td>2516D-01</td>
<td>Arın Gida Dis Ticaret A.S.</td>
<td>Processing of Fruit concentrate and puree</td>
<td>Civril – Denizli / TURKEY</td>
</tr>
</tbody>
</table>

**Agriculturel units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2516P-01</td>
<td>Apple</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-02</td>
<td>Cherry</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-03</td>
<td>Peach</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-04</td>
<td>Apricots</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-05</td>
<td>Pear</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-06</td>
<td>Quince</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-07</td>
<td>Strawberries</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-08</td>
<td>Pomegranate</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
<tr>
<td>2516P-09</td>
<td>Black Carrot</td>
<td>Concentrate, fresh</td>
<td>Organic</td>
<td>2009D-01</td>
</tr>
</tbody>
</table>
19-2527 LIMKON

Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2527D-01</td>
<td>LIMKON GIDA SAN. VE TİC. AŞ</td>
<td>Import, export, processing documentation, marketing</td>
<td>Adana Hacı Sabancı OrganizeSanayi Bölgesi</td>
</tr>
</tbody>
</table>

Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2527P-01</td>
<td>Apple</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-02</td>
<td>Pears</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-03</td>
<td>Quince</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-04</td>
<td>Pomegranate</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-05</td>
<td>Grapefruit</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-06</td>
<td>Orange</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-07</td>
<td>Lemon</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-08</td>
<td>Mandarin</td>
<td>Concentrate, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-09</td>
<td>Carrots</td>
<td>Concentrate, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-10</td>
<td>Black Carrots</td>
<td>Concentrate, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-11</td>
<td>Strawberry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-12</td>
<td>Sour Cherry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-13</td>
<td>Cherry</td>
<td>Concentrate, Puree, NFC fruit juice, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-14</td>
<td>Tomato</td>
<td>Concentrate, Puree, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-15</td>
<td>Apricot</td>
<td>Concentrate, Puree, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
<tr>
<td>2527P-16</td>
<td>Peaches</td>
<td>Concentrate, Puree, Aroma</td>
<td>Organic</td>
<td>2527D-01</td>
</tr>
</tbody>
</table>
## 20-2534 WBT

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2534D-01</td>
<td>WBT</td>
<td>Processing, production, storing, marketing, documentation</td>
<td>Organize San. 2. cad. No: 10 – ANTALYA</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectare and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2534P-01</td>
<td>Anise</td>
<td>Seed</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-02</td>
<td>Bay</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-03</td>
<td>Carob</td>
<td>Powder</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-04</td>
<td>Cistus</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-05</td>
<td>Cumin</td>
<td>Seed</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-06</td>
<td>Fennel</td>
<td>Seed</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-07</td>
<td>Myrtle</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-08</td>
<td>Oregano</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-09</td>
<td>Poppy</td>
<td>Seed</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-10</td>
<td>Rosemary</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-11</td>
<td>Sage</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-12</td>
<td>Savory</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-13</td>
<td>Sumac</td>
<td>Powder</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-14</td>
<td>Thyme</td>
<td>Leaves</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
<tr>
<td>2534P-15</td>
<td>Vitex</td>
<td>Seeds</td>
<td>Organic</td>
<td>2534D-01</td>
</tr>
</tbody>
</table>
### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2542D-01</td>
<td>EKOTURKA TEKSTİL TARIM HAYV. TAŞ. SAN. VE TİC. AŞ</td>
<td>Processing, packing, storing, documentation, marketing</td>
<td>Petrol Mah. Organize Sanayi Bölgesi 7. Cadde No:9 Adıyaman-TURKEY</td>
</tr>
<tr>
<td>2542D-02</td>
<td>Mersin Free Zone Store</td>
<td>Processing, packing, storing</td>
<td>Evren mah. 100.yıl cad. No 2 Karacailyas-Mersin-TURKEY</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2542P-01</td>
<td>Barley</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-02</td>
<td>Beans</td>
<td>Bean</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-03</td>
<td>Chickpea</td>
<td>Pea</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-04</td>
<td>Corn</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-05</td>
<td>Cotton</td>
<td>Lint</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-06</td>
<td>Hazelnuts</td>
<td>Kernel</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-07</td>
<td>Kidney Bean</td>
<td>Bean</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-08</td>
<td>Lentils Green</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-09</td>
<td>Lentils Red</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-10</td>
<td>Lentils Yellow</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-11</td>
<td>Linseed</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-12</td>
<td>Millet</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-13</td>
<td>Mung Beans</td>
<td>Bean</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-14</td>
<td>Mustard</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-15</td>
<td>Oat</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-16</td>
<td>Peas</td>
<td>Pea</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-17</td>
<td>Pistachios</td>
<td>Kernel</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-18</td>
<td>Rapeseeds</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-19</td>
<td>Rice</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-20</td>
<td>Rye</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>2542P-21</td>
<td>Safflower</td>
<td>Grain</td>
<td>Organic</td>
<td>2542D-01, 02</td>
</tr>
<tr>
<td>Product no</td>
<td>Name product</td>
<td>Last product</td>
<td>Status</td>
<td>Process no</td>
</tr>
<tr>
<td>------------</td>
<td>--------------</td>
<td>--------------</td>
<td>---------</td>
<td>------------</td>
</tr>
<tr>
<td>2573P-01</td>
<td>Almonds</td>
<td>Crusted</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-02</td>
<td>Apple</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-03</td>
<td>Apricots</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-04</td>
<td>Blackberry</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-05</td>
<td>Cherry</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-06</td>
<td>Grapes</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-07</td>
<td>Mulberry</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-08</td>
<td>Nectarine</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-09</td>
<td>Peach</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-10</td>
<td>Pears</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-11</td>
<td>Plum</td>
<td>Fresh, dried</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-12</td>
<td>Quince</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-13</td>
<td>Sour Cherry</td>
<td>Fresh</td>
<td>Organic</td>
<td>-</td>
</tr>
<tr>
<td>2573P-14</td>
<td>Walnut</td>
<td>Crusted</td>
<td>Organic</td>
<td>-</td>
</tr>
</tbody>
</table>
## 23-2629 BIO NATURAL

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2629P-01</td>
<td>Apple</td>
<td>Fresh</td>
<td>IC2</td>
<td>-</td>
</tr>
<tr>
<td>2629P-02</td>
<td>Apricot</td>
<td>Fresh</td>
<td>IC2</td>
<td>-</td>
</tr>
</tbody>
</table>

---

## 24-2630 BAHÇECİ TARIM

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2630D-01</td>
<td>Bahceci tarım urunleri tic ltd sti</td>
<td>Marketing, Storage, Accounting,</td>
<td>Balçova - İzmir</td>
</tr>
<tr>
<td>2630D-02</td>
<td>Yosun tarım</td>
<td>Processing, Packaging, Storage</td>
<td>Yüreğir / Adana</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2630-P01</td>
<td>%3 Copper</td>
<td>Okey</td>
<td>organic</td>
<td>2630-D01</td>
</tr>
</tbody>
</table>
### 25- 2633 ASON

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2633P-01</td>
<td>Barley</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-02</td>
<td>Wheat</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-03</td>
<td>Maize</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-04</td>
<td>Sorghum</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-05</td>
<td>Oat</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-06</td>
<td>Rye</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-07</td>
<td>Triticale</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-08</td>
<td>Pistachio</td>
<td>Nuts</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-09</td>
<td>Hazelnuts</td>
<td>Nuts</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-10</td>
<td>Millet</td>
<td>Grain</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-11</td>
<td>Flax Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-12</td>
<td>Sunflower Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-13</td>
<td>Rape Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-14</td>
<td>Mustard Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-15</td>
<td>Safflower Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-16</td>
<td>Apricot Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-17</td>
<td>Grape Seed</td>
<td>Oil Seed</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-18</td>
<td>Chickpeas</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-19</td>
<td>Red Beans</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-20</td>
<td>White Beans</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-21</td>
<td>Green Mung beans</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-22</td>
<td>Red Lentils</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-23</td>
<td>Green Lentils</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-24</td>
<td>Yellow Lentils</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
<tr>
<td>2633P-25</td>
<td>Pea Beans</td>
<td>Pulses</td>
<td>Organic</td>
<td>2633D-01</td>
</tr>
</tbody>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2650P-01</td>
<td>Apple Puree Concentrate</td>
<td>Puree Concentrate 17-19 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-02</td>
<td>Apple Puree Concentrate</td>
<td>Puree Concentrate 30-32 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-03</td>
<td>Apple Puree Concentrate</td>
<td>Puree Concentrate 36-38 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-04</td>
<td>Apple Puree</td>
<td>Puree SS 12-18 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-05</td>
<td>Apricot Puree Concentrate</td>
<td>Puree Concentrate 30-32 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-06</td>
<td>Apricot Puree</td>
<td>SS 12-20 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
<tr>
<td>2650P-07</td>
<td>Carrot Puree</td>
<td>SS 7,5-11,5 Brix</td>
<td>ORGANIC</td>
<td>2650D-01</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>2650D-01</td>
<td>Döhler Marmara Gıda Sanayi A.Ş.</td>
<td>Marketing and processing of fruit juice, fruit juice concentrate, puree, transporting, and documentations.</td>
<td>Koçyatağı Mevkii, Ovaköy Merkez / BALIKESİR-TURKEY</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td>Concentrate Type</td>
<td>Brix</td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------------</td>
<td>---------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>2650P-08</td>
<td>Carrot Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>20-22 Brix</td>
</tr>
<tr>
<td>2650P-09</td>
<td>Red Pepper Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>18-20 Brix</td>
</tr>
<tr>
<td>2650P-10</td>
<td>Red Pepper Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>22-24 Brix</td>
</tr>
<tr>
<td>2650P-11</td>
<td>Black Mulberry Puree</td>
<td>Puree SS</td>
<td>11-15 Brix</td>
</tr>
<tr>
<td>2650P-12</td>
<td>Peach Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>20-22 Brix</td>
</tr>
<tr>
<td>2650P-13</td>
<td>Peach Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>30-32 Brix</td>
</tr>
<tr>
<td>2650P-14</td>
<td>Peach Puree</td>
<td>Puree SS</td>
<td>8,5-11,5 Brix</td>
</tr>
<tr>
<td>2650P-15</td>
<td>Pear Puree</td>
<td>Puree SS</td>
<td>11-17 Brix</td>
</tr>
<tr>
<td>2650P-16</td>
<td>Pear Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>30-32 Brix</td>
</tr>
<tr>
<td>2650P-17</td>
<td>Plum Puree</td>
<td>Puree SS</td>
<td>10-18 Brix</td>
</tr>
<tr>
<td>2650P-18</td>
<td>Quince Puree</td>
<td>Puree SS</td>
<td>11-15 Brix</td>
</tr>
<tr>
<td>2650P-19</td>
<td>Quince Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>20-22 Brix</td>
</tr>
<tr>
<td>2650P-20</td>
<td>Sour Cherry Puree</td>
<td>Puree SS</td>
<td>16-24 Brix</td>
</tr>
<tr>
<td>2650P-21</td>
<td>Sour Cherry Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>30-32 Brix</td>
</tr>
<tr>
<td>2650P-22</td>
<td>Sweet Cherry Puree Concentrate</td>
<td>Puree Concentrate</td>
<td>30-32 Brix</td>
</tr>
</tbody>
</table>
## 27- NIGELLA

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2654P-01</td>
<td>Pears</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-02</td>
<td>Raspberries</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-03</td>
<td>Grapes</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-04</td>
<td>Quince</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-05</td>
<td>Almonds</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-06</td>
<td>Blackberry</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-07</td>
<td>Walnut</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-08</td>
<td>Mulberry</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-09</td>
<td>Apple</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-10</td>
<td>Plum</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-11</td>
<td>Apricot</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-12</td>
<td>Cherry</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-13</td>
<td>Peaches</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-14</td>
<td>Sour Cherry</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-15</td>
<td>Eggplant</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-16</td>
<td>Pumpkin</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-17</td>
<td>Cucumber</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-18</td>
<td>Tomato</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>2654P-19</td>
<td>Okra</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td>-</td>
</tr>
<tr>
<td>Item Code</td>
<td>Item Description</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>-------------</td>
<td>-------------------------</td>
<td>-------</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>2654P-20</td>
<td>Potato</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-21</td>
<td>Parsley</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-22</td>
<td>Red Pepper</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-23</td>
<td>Celery</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-24</td>
<td>Leek</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-25</td>
<td>Golden Berry</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-26</td>
<td>Stuffed Pepper</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-27</td>
<td>Cayenne Pepper</td>
<td>Raisin</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-28</td>
<td>Melon</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-29</td>
<td>Watermelon</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-30</td>
<td>Onion</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-31</td>
<td>Garlic</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-32</td>
<td>Corn</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-33</td>
<td>Spinach</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-34</td>
<td>Broccoli</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-35</td>
<td>Cauliflower</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-36</td>
<td>Peas</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-37</td>
<td>Organic Tarhana</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-38</td>
<td>Organic Tomato Sauce</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-39</td>
<td>Organic Pepper Sauce</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-40</td>
<td>Organic Hot Sauce</td>
<td>Fresh</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-41</td>
<td>Organic Eggplant with Basil Sauce</td>
<td>Organic Eggplant with Basil Sauce</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-42</td>
<td>Organic Apple Vinegar</td>
<td>Organic Apple Cider Vinegar</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-43</td>
<td>Organic home-made pasta (noodles)</td>
<td>Organic home-made pasta (noodles)</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-44</td>
<td>Grape Vinegar</td>
<td>Grape Vinegar</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-45</td>
<td>Boiled Grape Juice</td>
<td>Boiled Grape Juice</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-46</td>
<td>Mixed pickles</td>
<td>Mixed pickles</td>
<td>ORGANIC</td>
<td></td>
</tr>
<tr>
<td>2654P-47</td>
<td>Tomatoes</td>
<td>Dried</td>
<td>ORGANIC</td>
<td></td>
</tr>
</tbody>
</table>
### 2654P-48
- **Golden Berry**: Dried
- **Org**: ORGANIC

### 2654P-49
- **Boiled Apple juices**: Boiled Apple juices
- **Org**: ORGANIC

### 28- 2669 GKM

#### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

#### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3006F-04</td>
<td>Novopetrovskoye - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3006F-05</td>
<td>EF Kahovskyi - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3006F-18</td>
<td>Ingulets - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3006F-19</td>
<td>Nadiya - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3006F-20</td>
<td>Shedriy Lan - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
</tbody>
</table>

#### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>2669P-01</td>
<td>Carob Fruit</td>
<td>Locust Bean Gum</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-02</td>
<td>Carob Fruit</td>
<td>Kibbled Carob Cubes</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-03</td>
<td>Carob Fruit</td>
<td>Carob Germ</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-04</td>
<td>Carob Fruit</td>
<td>Toasted Carob Powder</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-05</td>
<td>Carob Fruit</td>
<td>Carob Molasses</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-06</td>
<td>Carob Fruit</td>
<td>Clear Carob Syrup</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
<tr>
<td>2669P-07</td>
<td>Carob Fruit</td>
<td>Carob Fiber</td>
<td>ORGANIC</td>
<td>2669D-01.02</td>
</tr>
</tbody>
</table>
### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3006D-01</td>
<td>Spelta ltd.</td>
<td>Import-export, documentation, finance, forwarding, investment, organizing farms and processors</td>
<td>2 Frunze Str., 73002 Kherson, Ukraine</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3006P-01</td>
<td>Barley Seeds</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-02</td>
<td>Corn Seeds</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-03</td>
<td>Flax Seeds</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-04</td>
<td>Mustard Seeds, Oil and Cake/expeller</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-05</td>
<td>Peas Seeds</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-06</td>
<td>Rapeseed Seeds, Oil and Cake/expeller</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-07</td>
<td>Sunflower Seeds, Oil and Cake/expeller</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-08</td>
<td>Walnut Kernel</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
<tr>
<td>3006P-09</td>
<td>Wheat Seeds</td>
<td>Seeds</td>
<td>Org</td>
<td>3006D-01</td>
</tr>
</tbody>
</table>

### 30-3013 Alef Ltd.

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3013F-24</td>
<td>FH &quot;Don&quot; - Lugansk</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-26</td>
<td>TOV Agrofirma &quot;Kalmychanka&quot; - Lugansk</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-27</td>
<td>FH &quot;Vdovenko&quot; - Lugansk</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-28</td>
<td>STOV AF &quot;Zakotnenskaya&quot;</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-29</td>
<td>TOV &quot;Ros Agro&quot; - Kirovograd</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-30</td>
<td>TzOV &quot;Lyubava-Agro&quot; - Ternopil</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-31</td>
<td>TOV &quot;Agrofirma Druzba&quot; - Kiev</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-32</td>
<td>TOV &quot;Agroalyans&quot; - Kherson</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-33</td>
<td>OOO SHP &quot;Novaya Ukraina&quot; - Kiev</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3013F-34</td>
<td>TDV &quot;Kolos&quot; - Kirovograd</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>Unit nr</td>
<td>Unit</td>
<td>Process</td>
<td>Address</td>
</tr>
<tr>
<td>--------</td>
<td>---------------</td>
<td>-------------------------------------------------------------------------</td>
<td>----------------------------------------------</td>
</tr>
<tr>
<td>3013D-01</td>
<td>ALEF ltd.</td>
<td>Import-export, documentation, finance, forwarding, investment, organizing farms and processors</td>
<td>46, Sovetskaya str., Kherson, 73000, Ukraine</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3013P-01</td>
<td>Alfa-alfa</td>
<td>Seeds, feed</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-02</td>
<td>Barley</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-03</td>
<td>Buckwheat</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-04</td>
<td>Cheak-pea</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-05</td>
<td>Corn</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-06</td>
<td>Flax</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-07</td>
<td>Grape</td>
<td>Fresh</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-08</td>
<td>Lentil</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-09</td>
<td>Lupine</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-10</td>
<td>Millet</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-11</td>
<td>Mustard</td>
<td>Seeds, Oil, Cake/expeller</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-12</td>
<td>Oat</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-13</td>
<td>Peas</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-14</td>
<td>Rapseseed</td>
<td>Seeds, Oil, Cake/expeller</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-15</td>
<td>Rye</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-16</td>
<td>Sorghum</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-17</td>
<td>Soybean</td>
<td>Seeds, Oil, Cake/expeller</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-18</td>
<td>Sunflower</td>
<td>Seeds, Oil, Cake/expeller</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-19</td>
<td>Vegetables</td>
<td>Fresh</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-20</td>
<td>Walnut</td>
<td>Kernel</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
<tr>
<td>3013P-21</td>
<td>Wheat</td>
<td>Seeds</td>
<td>Org</td>
<td>3013D-01</td>
</tr>
</tbody>
</table>

31-3020 Region Agro ltd.

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product nr</td>
<td>Product</td>
<td>Final product</td>
<td>Status</td>
</tr>
<tr>
<td>------------</td>
<td>------------------</td>
<td>------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>3020P-01</td>
<td>Alfa-alfa Seeds</td>
<td>Seeds, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-02</td>
<td>Barley Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-03</td>
<td>Buckwheat Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-04</td>
<td>Corn Seeds, oil</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-05</td>
<td>Flax Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-06</td>
<td>Millet Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-07</td>
<td>Mustard Seeds,</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-08</td>
<td>Oat Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-09</td>
<td>Peas Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-10</td>
<td>Rapeseeds Seeds</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-11</td>
<td>Rye Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-12</td>
<td>Safflower Seeds</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-13</td>
<td>Sorghum Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-14</td>
<td>Soybean Seeds</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-15</td>
<td>Sunflower Seeds</td>
<td>Seeds, oil, cake</td>
<td>ORG</td>
</tr>
<tr>
<td>3020P-16</td>
<td>Wheat Seeds</td>
<td>Seeds</td>
<td>ORG</td>
</tr>
</tbody>
</table>
### Products

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3026P-01</td>
<td>Cedar Pine Nut Kernel</td>
<td>Nuts</td>
<td>ORG</td>
<td>3026D-01, 02</td>
</tr>
<tr>
<td>3026P-02</td>
<td>Cedar Pine Nut Kernel Oil</td>
<td>Oil</td>
<td>ORG</td>
<td>3026D-01, 02</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3076F-01</td>
<td>SOOO Ptakhivnyk - Kherson</td>
<td>(d) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3076F-02</td>
<td>OOO TD GRAH - Kherson</td>
<td>(d) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3076F-03</td>
<td>Askania-Nova OPH - Kherson</td>
<td>(d) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3076F-04</td>
<td>Prodexim CD - Kherson</td>
<td>(d) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3076F-05</td>
<td>Lana Podove - Kherson</td>
<td>(d) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3076D-01</td>
<td>Ukrainian Food Corporation LLC</td>
<td>Export, trade, administration, organizing farms and processors, transport, storage, finance</td>
<td>5, Port-Elevator, Kherson, 73000, Ukraine</td>
</tr>
</tbody>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3076P-01</td>
<td>Alfalfa</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-02</td>
<td>Barley</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-03</td>
<td>Cherry</td>
<td>Fresh</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-04</td>
<td>Corn</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-05</td>
<td>Flax</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-06</td>
<td>Grape</td>
<td>Fresh</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-07</td>
<td>Millet</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-08</td>
<td>Peach</td>
<td>Fresh</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-09</td>
<td>Peas</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-10</td>
<td>Pumpkin</td>
<td>Kernel</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-11</td>
<td>Rapeseeds</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-12</td>
<td>Strawberry</td>
<td>Fresh</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-13</td>
<td>Sunflower</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-14</td>
<td>Walnut</td>
<td>Kernel</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-15</td>
<td>Wheat</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-16</td>
<td>Mustard</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
<tr>
<td>3076P-17</td>
<td>Soybean</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3076D-01</td>
</tr>
</tbody>
</table>

### 34-3077 TOO PROIZVODSTVENNIY KOMPLEX MOL-TABYS

#### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3077F-01</td>
<td>TOO “IshimAgroNord”</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3077F-02</td>
<td>TOO “JNV”</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

#### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

#### Products:
<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3077P-01</td>
<td>Barley</td>
<td>Seeds, grouts</td>
<td>A,D</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-02</td>
<td>Camelina</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-03</td>
<td>Chick-pea</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-04</td>
<td>Flax</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-05</td>
<td>Mustard</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-06</td>
<td>Oat</td>
<td>Seeds, flour</td>
<td>A,D</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-07</td>
<td>Peas</td>
<td>Seeds, grouts</td>
<td>A,D</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-08</td>
<td>Rapessed</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-09</td>
<td>Rye</td>
<td>Seeds, grouts, flour</td>
<td>A,D</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
<tr>
<td>3077P-10</td>
<td>Wheat</td>
<td>Seeds, grouts, flour</td>
<td>A,D</td>
<td>ORG</td>
<td>3077D-01</td>
</tr>
</tbody>
</table>

### 35-3087 YUGEKOTOP

#### Agricultural units:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Unit name</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3087F-01</td>
<td>“Krynichanskoe” – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-02</td>
<td>“Dovira+” – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-03</td>
<td>“Edem” – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-04</td>
<td>“Ukragroinvest-Holding” – Jitomyr</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-05</td>
<td>“Dobrobut” – Kirovograd</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-09</td>
<td>Plasa - Odessa</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-10</td>
<td>Serbinova - Odessa</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-11</td>
<td>TOV NIK-AGRO – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-12</td>
<td>TOV Promin – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-13</td>
<td>PSP Agro Urojai – Nikolaev</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3087F-14</td>
<td>TOV Stebne – Cherkassy</td>
<td>18 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

#### Processing units:

<table>
<thead>
<tr>
<th>Unit no</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3087D-02</td>
<td>SC Agrocontract ltd.</td>
<td>Storage and transshipment</td>
<td>89, Kosmonavtov str., Nikolaev, Ukraine</td>
</tr>
<tr>
<td>Product no</td>
<td>Name product</td>
<td>Last product</td>
<td>Product Category</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>---------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>3087P-01</td>
<td>Alfalfa</td>
<td>Seeds and cake/expeller</td>
<td>A,E</td>
</tr>
<tr>
<td>3087P-02</td>
<td>Barley</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-03</td>
<td>Corn</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-04</td>
<td>Flax</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,E</td>
</tr>
<tr>
<td>3087P-05</td>
<td>Lupine</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-06</td>
<td>Millet</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-07</td>
<td>Peas</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-08</td>
<td>Rapeseeds</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
</tr>
<tr>
<td>3087P-09</td>
<td>Sorgum</td>
<td>Seeds</td>
<td>A</td>
</tr>
<tr>
<td>3087P-10</td>
<td>Sugarbeet</td>
<td>Cake/expeller and pulp/molasses/pellets</td>
<td>A,E</td>
</tr>
<tr>
<td>3087P-11</td>
<td>Sunflower</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
</tr>
<tr>
<td>3087P-12</td>
<td>Wheat</td>
<td>Seeds</td>
<td>A</td>
</tr>
</tbody>
</table>

36-3090 EVERI LTD.
### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3090F-01</td>
<td>Strumok - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-02</td>
<td>Perlyna Strumka - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-03</td>
<td>Dzherelo - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-04</td>
<td>Vapet - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-05</td>
<td>SK im.Shevchenko - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-06</td>
<td>Glubokoe - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-07</td>
<td>SFH Rusev - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-08</td>
<td>Strumok Agroservice - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3090F-09</td>
<td>Dalakov P.D. - Odessa</td>
<td>ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3090D-01</td>
<td>Everi ltd.</td>
<td>Import-export, trading, finance, documentation, organizing farms and processors, forwarding</td>
<td>117, Grazhdanskaya str., Mykolayiv, Ukraine</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3090P-01</td>
<td>Alfalfa</td>
<td>Seeds, hay, pellets</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-02</td>
<td>Barley</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-03</td>
<td>Corn</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-04</td>
<td>Flax</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-05</td>
<td>Lupine</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-06</td>
<td>Oat</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-07</td>
<td>Peas</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-08</td>
<td>Rapeseeds</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-09</td>
<td>Rye</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-10</td>
<td>Sorghum</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-11</td>
<td>Sugarbeet</td>
<td>Seeds, cake/expeller, Pulp pellets/molasses</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-12</td>
<td>Sunflower</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-13</td>
<td>Walnut</td>
<td>Kernel</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
<tr>
<td>3090P-14</td>
<td>Wheat</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3090D-01</td>
</tr>
</tbody>
</table>
### 37-3092 GRAINAGRO LTD

#### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3092F-02</td>
<td>&quot;Maryanivske&quot; - Odessa</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-03</td>
<td>&quot;Rodina&quot; - Odessa</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-06</td>
<td>LTD &quot;Agro-DIS&quot; - Odessa</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-07</td>
<td>&quot;Svitanok&quot; - Odessa</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-08</td>
<td>&quot;Dobrobut&quot; - Poltava</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-09</td>
<td>PP &quot;Yuran&quot; - Lugansk</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-10</td>
<td>TOV Agrofirma &quot;LBB&quot; - Lugansk</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3092F-11</td>
<td>TOV &quot;Suvorova&quot; - Lugansk</td>
<td>ha arable farming, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

#### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3092D-01</td>
<td>«Grainagro» ltd.</td>
<td>Import-export, Trader, , Finance, Documentation, Forwarding, Investment, Organizing farms and processors</td>
<td>12, Shevchenko avenue. off. 2., Odessa, 65058 Ukraine</td>
</tr>
</tbody>
</table>

#### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3092P-01</td>
<td>Barley Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-02</td>
<td>Buckwheat Seeds</td>
<td>A,D</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-03</td>
<td>Corn Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-04</td>
<td>Flax Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-05</td>
<td>Lupine Seeds</td>
<td>A,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-06</td>
<td>Millet Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-07</td>
<td>Mustard Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-08</td>
<td>Oat Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-09</td>
<td>Peas Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-10</td>
<td>Rapeseed Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-11</td>
<td>Rye Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-12</td>
<td>Sorghum Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-13</td>
<td>Sunflower Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
<tr>
<td>3092P-14</td>
<td>Wheat Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td></td>
<td>3092D-01</td>
</tr>
</tbody>
</table>
### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3093F-03</td>
<td>Borozenske SVK - Kherson</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-09</td>
<td>Krynytsya - Kherson</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-11</td>
<td>Agrofirma Slavutich - Kirovograd</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-20</td>
<td>Oasis - Odessa</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-21</td>
<td>Osnova - Nikolaev</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-22</td>
<td>MTD - Nikolaev</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-29</td>
<td>Vidrodzhennya PSP - Nikolaev</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-30</td>
<td>Rosiya PSP - Nikolaev</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-31</td>
<td>Zorya AK Ltd. - Kirovograd</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-32</td>
<td>Roznoshenske Ltd. – Kirovograd</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-33</td>
<td>Myr AF Ltd. – Kirovograd</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3093F-34</td>
<td>Rozkishina AK Ltd. – Kirovograd</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
</tbody>
</table>

### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3093D-01</td>
<td>Dnepr-2</td>
<td>Import-export, documentation, finance, forwarding, investment, organizing farms and processors</td>
<td>10 Naftovykiv str., Kherson, Ukraine</td>
</tr>
<tr>
<td>3093D-03</td>
<td>Region-Agro ltd</td>
<td>Import-export, documentation, finance, forwarding, investment, organizing farms and processors</td>
<td>10 Naftovykiv str., Kherson, Ukraine</td>
</tr>
<tr>
<td>3093D-06</td>
<td>Amiranda</td>
<td>Internal control, transport, administration, sampling</td>
<td>33 Zhukovskogo str., office 403, Odessa, Ukraine</td>
</tr>
<tr>
<td>3093D-09</td>
<td>Plant Breeding &amp; Genetic Institute</td>
<td>Breeding and multiplication of original (and commercial) seed (wheat, barley, peas, sunflower, corn, soybean etc.)</td>
<td>3, Ovidiopol'skaya road, Odessa, 65036 Ukraine</td>
</tr>
<tr>
<td>3093D-14</td>
<td>Agro-Transit-Invest LTD</td>
<td>Storage, Transshipment, Forwarding, Drying of goods</td>
<td>11, Domobudivelna Str., Kherson, Ukraine, 73011</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3093P-01</td>
<td>Alfa-alfa Cake</td>
<td></td>
<td>A,D</td>
<td>ORG</td>
<td>3093D-01,03,06,09-14,20-26</td>
</tr>
<tr>
<td>Unit nr</td>
<td>Unit name</td>
<td>Process</td>
<td>Address</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>-----------</td>
<td>---------</td>
<td>---------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3094D-01</td>
<td>Polba PE</td>
<td>Import-export, documentation, finance, forwarding, investment, organizing farms and processors</td>
<td>2 Frunze Str., Kherson, Ukraine, 73002</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**39-3094 POLBA**

*Oil and seed cake will be produced from the raw quantity mentioned above*

### Production unit:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3094F-01</td>
<td>PE Agrofirm «Pancheve»</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3094F-02</td>
<td>Agrofirm Chkalova Ltd.</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3094F-03</td>
<td>PE Agrofirm «Mytrofanivska»</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
<tr>
<td>3094F-04</td>
<td>PE Agrofirm «Prestyzh»</td>
<td>ha arable fields, 1 producer</td>
<td>ORG</td>
</tr>
</tbody>
</table>
## Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3094P-01</td>
<td>Alfa-alfa</td>
<td>Seeds, cake</td>
<td>A,E</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-02</td>
<td>Barley</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-03</td>
<td>Corn</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-04</td>
<td>Soybean</td>
<td>Seeds, oil, cake</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-05</td>
<td>Sugarbeet</td>
<td>Cake</td>
<td>A,E</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-06</td>
<td>Sunflower</td>
<td>Seeds, oil, cake</td>
<td>A,E</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
<tr>
<td>3094P-07</td>
<td>Wheat</td>
<td>Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3094D-01</td>
</tr>
</tbody>
</table>

## 40-3096 EL DORADO OIL

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
<th>Farmer number</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3096D-01</td>
<td>El Dorado Oils llc.</td>
<td>Export, trade, administration, finance, organizing farms and processors, transport, storage</td>
<td>8A, Rizhskaya Str., Kyiv, 04112 Ukraine</td>
</tr>
</tbody>
</table>

## Products

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3096P-01</td>
<td>Barley</td>
<td>Seeds, grouts</td>
<td>A,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-02</td>
<td>Buckwheat</td>
<td>Seeds, grouts</td>
<td>A,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-03</td>
<td>Corn</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-04</td>
<td>Flax</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-05</td>
<td>Millet</td>
<td>Seeds, grouts</td>
<td>A,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-06</td>
<td>Mustard</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-07</td>
<td>Oat</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-08</td>
<td>Peas</td>
<td>Seeds, grouts</td>
<td>A,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-09</td>
<td>Pumpkin</td>
<td>Kernel</td>
<td>A</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
<tr>
<td>3096P-10</td>
<td>Rapeseads</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3096D-01</td>
</tr>
</tbody>
</table>
### 41-3114 FARMEKS

#### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3114F-01</td>
<td>Urgut–Semerkant/ Özbekistan</td>
<td>39 ha arable fields, 14 producer</td>
<td>Organic</td>
</tr>
<tr>
<td>3114F-02</td>
<td>Fergana -Özbekistan</td>
<td>15 ha arable fields, 4 producer</td>
<td>Organic</td>
</tr>
<tr>
<td>3114F-03</td>
<td>Karakalpak-Özbekistan</td>
<td>3 ha arable fields, 1 producer</td>
<td>Organic</td>
</tr>
</tbody>
</table>

#### Processing units

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3114D-01</td>
<td>Farmeks</td>
<td>Documentation, Marketing, Processing, Packing</td>
<td>Ege Serbest Bölgesi, Gaziemir, İzmir - TURKEY</td>
</tr>
</tbody>
</table>

#### Products

<table>
<thead>
<tr>
<th>Product Nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3114P-01</td>
<td>Grape</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-02</td>
<td>Apple</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-03</td>
<td>Apricots</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-04</td>
<td>Mulberry</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-05</td>
<td>Sour cherry</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-06</td>
<td>Walnut</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-07</td>
<td>Pears</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-08</td>
<td>Beans</td>
<td>Grain</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-09</td>
<td>Tomatoes</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
<tr>
<td>3114P-10</td>
<td>Plum</td>
<td>Dried</td>
<td>Organic</td>
<td>3114D-01</td>
</tr>
</tbody>
</table>
### Agricultural units:

<table>
<thead>
<tr>
<th>Unit no</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3120F-01</td>
<td>Rin-Agro - Kherson</td>
<td>b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3120F-03</td>
<td>Universal Expo - Kherson</td>
<td>b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3120F-04</td>
<td>TOV Shestirnia - Dnepropetrovsk</td>
<td>b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3120F-06</td>
<td>TOV Inter - Kherson</td>
<td>b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3120D-01</td>
<td>Sadeko Organic ltd.</td>
<td>Import-export, trader, forwarding, investment, documentation, finance, organizing farms and processors</td>
<td>14, Parovozna str, Kherson, Ukraine</td>
</tr>
<tr>
<td>3120D-02</td>
<td>PrAT “Dneprovskiy terminal”</td>
<td>Forwarding, transportation</td>
<td>169 Perekopskaya str., Kherson, Ukraine</td>
</tr>
<tr>
<td>3120D-12</td>
<td>Art Seed ltd.</td>
<td>Import-export, trading, documentation, financing</td>
<td>14, Parovozna str, Kherson, Ukraine</td>
</tr>
<tr>
<td>3120D-14</td>
<td>Agro-Transit-Invest LTD</td>
<td>Storage, Transshipment, Forwarding, Drying of goods</td>
<td>11, Domobudivelnna Str., Kherson, Ukraine, 73011</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3120P-01</td>
<td>Barley Seeds</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-02</td>
<td>Beans Seeds</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-03</td>
<td>Buckwheat Seeds</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-04</td>
<td>Chick-pea Seeds</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-05</td>
<td>Coriander Seeds</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-06</td>
<td>Corn Seeds, flour meal</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-07</td>
<td>Flax Seeds, oil and cake/expeller</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>3120P-08</td>
<td>Lentil Seeds, grouts</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3120D-01 - 14</td>
</tr>
<tr>
<td>Unit No</td>
<td>Name Unit</td>
<td>Process</td>
<td>Address</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>----------------------------</td>
<td>----------------------------------</td>
<td>----------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3121D-02</td>
<td>Selamawit G/Mariam</td>
<td>Trade, import &amp; export</td>
<td>Kirkos Sub City Odaa Tower Office no. 514 Addis Ababa, Ethiopia</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3121D-03</td>
<td>GHTY General Trading PLC</td>
<td>Trade, import &amp; export</td>
<td>Arada Sub City MK Building Office No. 509 Addis Ababa, Ethiopia</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Production unit:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Name Unit</th>
<th>Number of producers, total hectares and crops</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3121F-01</td>
<td>Gambella- Ethiopia</td>
<td>15 producers, 670 ha, Sesame</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>13 producers, 485 ha, Mung bean</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>10 producers, 110 ha, Soybean</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>15 producers, 550 ha, Sorghum</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>14 producers, 650 ha, Beans</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>2 producers, 300 ha, Rice</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>11 producers, 600 ha, Maize</td>
<td>Organic</td>
</tr>
<tr>
<td></td>
<td>Gambella- Ethiopia</td>
<td>2 producers, 600 ha, peanuts</td>
<td>Organic</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3121P-01</td>
<td>Beans</td>
<td>Beans</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-02</td>
<td>Maize</td>
<td>Grains</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>Unit nr</td>
<td>Product</td>
<td>Final product</td>
<td>Status</td>
<td>Processing unit</td>
</tr>
<tr>
<td>---------</td>
<td>---------</td>
<td>---------------</td>
<td>--------</td>
<td>-----------------</td>
</tr>
<tr>
<td>3121P-03</td>
<td>Mung bean</td>
<td>Beans</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-04</td>
<td>Rice</td>
<td>Rice</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-05</td>
<td>Sesame</td>
<td>Seeds</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-06</td>
<td>Sorghum</td>
<td>Grains</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-07</td>
<td>Soybean</td>
<td>Beans</td>
<td>Organic</td>
<td>3121D-01</td>
</tr>
<tr>
<td>3121P-08</td>
<td>Peanuts</td>
<td>dry</td>
<td>organic</td>
<td>3121D-01</td>
</tr>
</tbody>
</table>

44-3122 DoCOTTON

Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3122-D01</td>
<td>DoCotton</td>
<td>Collect, filtering, ginning, pressing, transport</td>
<td>Fabric 300 Hocent Tacikistan.</td>
</tr>
</tbody>
</table>

Production unit:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3122.F01</td>
<td>3122F1</td>
<td>(b) (4) ha cotton 103 contractor farmers</td>
<td>organic</td>
</tr>
</tbody>
</table>

Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3122-P1</td>
<td>Cotton</td>
<td>Cotton</td>
<td>Organic</td>
<td></td>
</tr>
<tr>
<td>3122-P2</td>
<td>Wheat</td>
<td>Wheat</td>
<td>Organic</td>
<td></td>
</tr>
</tbody>
</table>

45–3126 EKOTURKA KIRGIZIA

Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3126D-01</td>
<td>Zirve Teks</td>
<td>Trade, import &amp; export</td>
<td>Jalal Abad-KYRGYZSTAN</td>
</tr>
<tr>
<td>3126D-02</td>
<td>EKOTURKA</td>
<td>Trade, import &amp; export storing packing</td>
<td>Adiyaman Turkye</td>
</tr>
</tbody>
</table>

Production unit:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3126P-01</td>
<td>Cotton</td>
<td>Cotton Ginned</td>
<td>Organic</td>
<td>3126D-01, 02</td>
</tr>
<tr>
<td>3126P-02</td>
<td>Wheat</td>
<td>Wheat Seed</td>
<td>Organic</td>
<td>3126D-01, 02</td>
</tr>
<tr>
<td>3126P-03</td>
<td>Green Mung Bean</td>
<td>Green Mung Bean Seed</td>
<td>Organic</td>
<td>3126D-01, 02</td>
</tr>
<tr>
<td>3126P-04</td>
<td>Maize</td>
<td>Maize Seed</td>
<td>Organic</td>
<td>3126D-01, 02</td>
</tr>
</tbody>
</table>

46– 3127 EKOTURKA KAZAKHSTAN

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Name Unit</th>
<th>Number of producers, total hectares and crops</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3127F-01</td>
<td>KH &quot;DEL TV&quot;</td>
<td>1 Üretici, 10 ha Linseed, wheat,</td>
<td>Org</td>
</tr>
<tr>
<td>3127F-01</td>
<td>Agrocer</td>
<td>1 Üretici, 10 ha, Linseed, wheat, Sunflower, Barley, Canola,</td>
<td>Org</td>
</tr>
<tr>
<td>3127F-01</td>
<td>Aziya Tarangul</td>
<td>1 Üretici, 10 ha, Linseed, wheat, Barley, Oats, Canola, Peas, Buckwheat</td>
<td>Org</td>
</tr>
<tr>
<td>3127F-01</td>
<td>ASHAT AGRO</td>
<td>1 Üretici, 10 ha, Linseed, wheat, Barley, Oats, Canola, Buckwheat</td>
<td>Org</td>
</tr>
<tr>
<td>3127F-01</td>
<td>AZIYA TARANGUL</td>
<td>1 Üretici, 10 ha, Barley, canola, flax, peas, oats, wheat</td>
<td>Organik</td>
</tr>
</tbody>
</table>

### Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3127D-01</td>
<td>Qrient</td>
<td>Trade, import &amp; export</td>
<td>Almaoty Kazakhstan</td>
</tr>
<tr>
<td>3127D-02</td>
<td>EKOTURKA</td>
<td>Trade, import &amp; export storing packing</td>
<td>Adiyaman Turkye</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3127P-01</td>
<td>Barley</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
<td>-</td>
</tr>
<tr>
<td>3217P-02</td>
<td>Buckwheat</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
<td>-</td>
</tr>
<tr>
<td>3127P-03</td>
<td>Canola</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
<td>-</td>
</tr>
</tbody>
</table>
### Production unit:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Name Unit</th>
<th>Number of producers, total hectares and crops</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3128F-01</td>
<td>Agrofenovskaya</td>
<td>1 Farmer, Linseed, Wheat, Maize, Sunflower, Barley, Millet, Chickpea</td>
<td>Org</td>
</tr>
<tr>
<td>3128F-02</td>
<td>Ametist</td>
<td>1 Farmer, Wheat, Soybean, Maize, Sunflower, Barley, Mustard, Canola, Chickpea</td>
<td>Org</td>
</tr>
<tr>
<td>3128F-03</td>
<td>Krasniy Sad</td>
<td>1 Farmer, Linseed, Wheat, Soybean, Sunflower, Barley, Canola, Pea</td>
<td>Org</td>
</tr>
<tr>
<td>3128F-04</td>
<td>Rostov Mir</td>
<td>1 Farmer, Wheat, Maize, Sunflower, Barley, Vetch</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Products

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3128P-01</td>
<td>Barley</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-02</td>
<td>Canola</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-03</td>
<td>Chickpea</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-04</td>
<td>Linseed</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-05</td>
<td>Maize</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-06</td>
<td>Millet</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-07</td>
<td>Mustard</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-08</td>
<td>Pea</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-09</td>
<td>Sojabeans</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-10</td>
<td>Sunflower</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-11</td>
<td>Vetch</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
<tr>
<td>3128P-12</td>
<td>Wheat</td>
<td>Seeds</td>
<td>A</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

48-3140 PRODEXIM
### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3140F-01</td>
<td>FX Ykos I K – Kherson</td>
<td>(b) (4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-02</td>
<td>TD Prodexim – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-03</td>
<td>FG Svitanok – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-04</td>
<td>Imanuil Farm – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-05</td>
<td>TOV Pioneer – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-06</td>
<td>FH Viktoria-Askania – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3140F-07</td>
<td>TOV Kiselevka – Kherson</td>
<td>(b) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3140P-01</td>
<td>Corn</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-02</td>
<td>Peas</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-03</td>
<td>Pumpkin</td>
<td>Kernel</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-04</td>
<td>Rapeseeds</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-05</td>
<td>Soybean</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-06</td>
<td>Sunflower</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-07</td>
<td>Vegetables</td>
<td>Fresh</td>
<td>A,D</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
<tr>
<td>3140P-08</td>
<td>Wheat</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3140D-01</td>
</tr>
</tbody>
</table>

### Processors:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
</table>

### 49-3141 EKOLIUM
### Agricultural units:

<table>
<thead>
<tr>
<th>No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3141P-01</td>
<td>Barley Seeds, grouts, brans, flakes</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-02</td>
<td>Buckwheat Seeds, grouts, flakes</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-03</td>
<td>Corn Seeds, grouts, flour meal, flakes</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-04</td>
<td>Flax Seeds, oil and cake/expeller</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-05</td>
<td>Lupine Seeds</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-06</td>
<td>Millet Seeds, grouts, flour meal, flakes</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-07</td>
<td>Mustard Seeds, oil and cake/expeller</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-08</td>
<td>Oat Seeds, grouts, flakes, brans, flour meal</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-09</td>
<td>Peas Seeds, grouts, flakes</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-10</td>
<td>Pumpkin Kernel</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-11</td>
<td>Rapeseeds Seeds, oil and cake/expeller</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-12</td>
<td>Rye Seeds, grouts, flakes, brans, pasta, flour meal</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-13</td>
<td>Sorghum Seeds</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-14</td>
<td>Soybean Seeds, oil and cake/expeller</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-15</td>
<td>Spelt (wheat) Seeds, grouts, flakes, brans, pasta, flour meal</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-16</td>
<td>Sunflower Seeds, oil and cake/expeller</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-17</td>
<td>Walnut Kernel</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
<tr>
<td>3141P-18</td>
<td>Wheat Seeds, grouts, flakes, brans, pasta, flour meal</td>
<td>A, D, E</td>
<td>3141D-01</td>
<td></td>
</tr>
</tbody>
</table>

### Processing Units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>50-3142</td>
<td>SRF ROSE</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Agricultural Units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3142F-01</td>
<td>671, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (D) 4 ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-02</td>
<td>677-2, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-03</td>
<td>678-2, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-04</td>
<td>678-7, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-05</td>
<td>1142-5, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-06</td>
<td>1178-5, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-07</td>
<td>1266-9, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-08</td>
<td>1265-9, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-09</td>
<td>1266-7, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-10</td>
<td>1266-10, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-11</td>
<td>1266-12, Daepyeong-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-12</td>
<td>227-1, Guwon-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-13</td>
<td>230-7, Guwon-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-14</td>
<td>248-1, Guwon-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-15</td>
<td>248-3, Guwon-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-16</td>
<td>249-12, Guwon-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
<tr>
<td>3142F-17</td>
<td>31-23, Sin-ri, Gokseong-eup</td>
<td>🟢 (4)  ha Rose Production</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3142P-01</td>
<td>Rose</td>
<td>Leaves</td>
<td>Org</td>
<td>-</td>
</tr>
</tbody>
</table>
### 51-3149 JMG

**Processing Units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3149D-01</td>
<td>JANGHUENG MUSANGIM CO., LTD Factory</td>
<td>Processing of seaweed</td>
<td>1478, Jangheung-daero, Gwansan-eup, Jangheung-gun, Jeollanam-do, Korea</td>
</tr>
</tbody>
</table>

**Agricultural Units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3149F-01</td>
<td>Hanil: 10125, 10198, 10308, 10345, 10346, 10312, 10309, 10341, 10212, 10332, 10253</td>
<td>[a] [a] [a] [a] [a] ha, Seeweed, 4 Farmers</td>
<td>Org</td>
</tr>
<tr>
<td>3149F-02</td>
<td>Yongil: 10223, 10194, 10216, 10345, 10310</td>
<td>[b] [b] [b] [b] [b] ha, Seeweed, 3 Farmers</td>
<td>Org</td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3149P-001</td>
<td>Organic seaweed</td>
<td>Organic Snack</td>
<td>Org</td>
<td>JANGHUENG MUSANGIM</td>
</tr>
<tr>
<td>3149P-002</td>
<td>Organic seaweed</td>
<td>Organic Sea Tangle Snack</td>
<td>Org</td>
<td>JANGHUENG MUSANGIM</td>
</tr>
<tr>
<td>3149P-003</td>
<td>Organic seaweed</td>
<td>Roasted Seasoned Seaweed</td>
<td>Org</td>
<td>JANGHUENG MUSANGIM</td>
</tr>
</tbody>
</table>

### 52- 3170 NT-NOVA LTD

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3170D-01</td>
<td>NT-NOVA LTD</td>
<td>Import-export, trader, finance, investment, documentation, forwarding</td>
<td>11, Domostroitelnaya Street, 2 floor, office 203, Kherson, 73011 Ukraine</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Product category</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3170P-01</td>
<td>Barley Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-02</td>
<td>Buckwheat Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-03</td>
<td>Chickpea Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-04</td>
<td>Corn Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-05</td>
<td>Coriander Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-06</td>
<td>Flax Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-07</td>
<td>Lupine Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-08</td>
<td>Millet Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-09</td>
<td>Mustard Seeds, Oil, cake</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-10</td>
<td>Oat Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-11</td>
<td>Peas Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-12</td>
<td>Pumpkin Kernel</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-13</td>
<td>Rapeseed Seeds, Oil, cake</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-14</td>
<td>Rye Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-15</td>
<td>Sorghum Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-16</td>
<td>Soybean Seeds, Oil and Cake</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-17</td>
<td>Sugar beet Cake/pulp</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-18</td>
<td>Sunflower Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
<tr>
<td>3170P-19</td>
<td>Wheat Seeds</td>
<td>A</td>
<td>ORG</td>
<td>3170D-01</td>
<td></td>
</tr>
</tbody>
</table>

### 53-3172 ART SEED ltd.

### Processors:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Unit name</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3172D-01</td>
<td>Art Seed Ltd.</td>
<td>Import-export, trader, forwarding, investment, documentation, finance, organizing farms and processors</td>
<td>14, Parovozna str., Kherson, 73000, Ukraine</td>
</tr>
<tr>
<td>3172D-02</td>
<td>PrAT &quot;Dneprovskiy terminal&quot;</td>
<td>Storage, Transshipment, Forwarding</td>
<td>169 Perekopskaya str., Kherson, Ukraine</td>
</tr>
<tr>
<td>3172D-04</td>
<td>Agro-Transit-Invest LTD</td>
<td>Storage, Transshipment, Forwarding, Drying of goods</td>
<td>11, Domobudivelna Str., Kherson, Ukraine, 73011</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit No</th>
<th>Unit name</th>
<th>Number of producers, hectar and crop</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3172F-01</td>
<td>Triel-Agro - Kherson</td>
<td>60 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3172F-02</td>
<td>FG Diana - Kherson</td>
<td>60 ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Last product</th>
<th>Product Category</th>
<th>Status</th>
<th>Process no</th>
</tr>
</thead>
<tbody>
<tr>
<td>3172P-01</td>
<td>Barley</td>
<td>Seeds, grouts</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-02</td>
<td>Corn</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-03</td>
<td>Millet</td>
<td>Seeds, grouts, flour meal</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-04</td>
<td>Rapeseeds</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-05</td>
<td>Sorghum</td>
<td>Seeds</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-06</td>
<td>Soybean</td>
<td>Seeds, oil and cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-07</td>
<td>Sunflower</td>
<td>Seeds, oil and cake/expeller, kernel</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
<tr>
<td>3172P-08</td>
<td>Wheat</td>
<td>Seeds, grouts, flour meal, bran, semolina</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3172D-01 - 09</td>
</tr>
</tbody>
</table>

### Agricultural units:

<table>
<thead>
<tr>
<th>Unit no</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3180F-01</td>
<td>TOO &quot;Raisovskoe&quot;</td>
<td>(4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3180F-02</td>
<td>KH &quot;Zhumagulov&quot;</td>
<td>(4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3180F-03</td>
<td>TOO &quot;Boris-Romanovskoe&quot;</td>
<td>(4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
<tr>
<td>3180F-04</td>
<td>KH &quot;Asar&quot;</td>
<td>(4) ha arable fields, 1 producer</td>
<td>Org</td>
</tr>
</tbody>
</table>

### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Product Category</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3180P-01</td>
<td>Barley</td>
<td>Seeds, grouts</td>
<td>A,D</td>
<td>ORG</td>
<td>3180D-01</td>
</tr>
<tr>
<td>3180P-02</td>
<td>Flax</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3180D-01</td>
</tr>
<tr>
<td>3180P-03</td>
<td>Oat</td>
<td>Seeds, flour</td>
<td>A,D</td>
<td>ORG</td>
<td>3180D-01</td>
</tr>
<tr>
<td>3180P-04</td>
<td>Peas</td>
<td>Seeds, grouts</td>
<td>A,D</td>
<td>ORG</td>
<td>3180D-01</td>
</tr>
<tr>
<td>Product nr</td>
<td>Product</td>
<td>Final product</td>
<td>Product Category</td>
<td>Status</td>
<td>Processing unit</td>
</tr>
<tr>
<td>------------</td>
<td>-------------------</td>
<td>------------------------------------</td>
<td>------------------</td>
<td>--------</td>
<td>-----------------</td>
</tr>
<tr>
<td>3193P-01</td>
<td>Rapeseed</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
<tr>
<td>3193P-02</td>
<td>Soybean</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
<tr>
<td>3193P-03</td>
<td>Sunflower</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
</tbody>
</table>

**55-3193 OJSC Vinnytsa Oil-and-Fat-Production Plant**

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3193D-01</td>
<td>OJSC Vinnytsa Oil-and-Fat-Production Plant</td>
<td>Import-export, trader, finance, documentation, forwarding, investment, Process of oil and cake</td>
<td>26, Nemyrivske Shosse, Vinnytsa, 21034, Ukraine</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Products:**

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Product Category</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3193P-01</td>
<td>Rapeseed</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
<tr>
<td>3193P-02</td>
<td>Soybean</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
<tr>
<td>3193P-03</td>
<td>Sunflower</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3193D-01</td>
</tr>
</tbody>
</table>

**56-3194 LLC NIKMORSERVICES NIKOLAEV**

**Processing units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3194D-01</td>
<td>LLC “NIKMORSERVICES NIKOLAEV”</td>
<td>Import-Export, Trader, Finance, Documentation, Forwarding, Investment</td>
<td>1/1, Grazhdanskiy spusk, Nikolaev, 54002, Ukraine</td>
</tr>
</tbody>
</table>

**Agricultural units:**

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Product Category</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3194P-01</td>
<td>Sunflower</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3194D-01</td>
</tr>
</tbody>
</table>

### 57-3195 AGRO SUPPLIES LLC.

#### Processing units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Process</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>3195D-01</td>
<td>&quot;Agro Supplies&quot; LLC.</td>
<td>Import-Export, Trader, Finance, Documentation, Forwarding, Investment</td>
<td>27, Kaunasskaya str., Kiev, 02160, Ukraine</td>
</tr>
</tbody>
</table>

#### Agricultural units:

<table>
<thead>
<tr>
<th>Unit nr</th>
<th>Unit</th>
<th>Total area, crops and farmers</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Products:

<table>
<thead>
<tr>
<th>Product nr</th>
<th>Product</th>
<th>Final product</th>
<th>Product Category</th>
<th>Status</th>
<th>Processing unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>3195P-01</td>
<td>Sunflower</td>
<td>Seeds, Oil and Cake/expeller</td>
<td>A,D,E</td>
<td>ORG</td>
<td>3195D-01</td>
</tr>
</tbody>
</table>
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.
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

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.

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

Click here to send a Registered Email® message to anyone.
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 Annual Report for ETKO. The documentation has been saved in there folder.

Thank you

Mary Lou Crosetiere
Mary Lou Crosetiere | Program Specialist, National Organic Program
USDA AMS | 100 Riverside Parkway Suite 101 Fredericksburg VA 22406 540-361-2712
MaryLou.Lusby@ams.usda.gov
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; AIAinbox@ams.usda.gov; NOPAppeals@ams.usda.gov
Subject: Registered: Notice of Non-compliance - AIA6155PZ

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

This electronic message contains information generated by the USDA solely for the intended recipients. Any
Ref No: 2016070401
Subject: NONC AIA6155PZ.NC1

Date: July 04, 2016

Ms Zuck
To avoid reoccurrence 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 Licenses; 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.
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).
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;
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:
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.

Clients (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.
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
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.
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
LABELING
USE OF LOGO, LICENCES, CONFORMITY MARKS

- 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;
"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.
CERTIFICATE
Certificate of Organic Operation
No: XXXX.XX.XXX.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);

<table>
<thead>
<tr>
<th>Product no</th>
<th>Name product</th>
<th>Product Category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 Izmir, TURKEY, XX.XX.2015
Effective date of certification XX.XX.XXX
Next renewal date XX.XX.XXX
Last Inspection date XX.XX.XXX

The authenticity and validity of this document can be verified on www.etko.org
ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Şti.

ISO 17065
INSPECTION & CERTIFICATION PROCEDURE FOR ORGANIC PRODUCTS

Prepared by
ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Şti
160 Sokak No 13/3 Bornova
35100 İzmir
0232-3397606
www.etko.org
## Content

<table>
<thead>
<tr>
<th>Section No</th>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Introduction</td>
<td>3</td>
</tr>
<tr>
<td>2</td>
<td>Approval and Quality Management</td>
<td>4</td>
</tr>
<tr>
<td>3</td>
<td>Distribution List</td>
<td>4</td>
</tr>
<tr>
<td>4</td>
<td>Purpose</td>
<td>4</td>
</tr>
<tr>
<td>5</td>
<td>Responsibilities</td>
<td>4</td>
</tr>
<tr>
<td>6</td>
<td>Records and Reference Procedures</td>
<td>5</td>
</tr>
<tr>
<td>7</td>
<td>Certification Requirements</td>
<td>5</td>
</tr>
<tr>
<td>7.1</td>
<td>General</td>
<td>5</td>
</tr>
<tr>
<td>7.2</td>
<td>Application</td>
<td>7</td>
</tr>
<tr>
<td>7.2.1</td>
<td>Contract</td>
<td>8</td>
</tr>
<tr>
<td>7.2.2</td>
<td>Application Package</td>
<td>8</td>
</tr>
<tr>
<td>7.2.2.1</td>
<td>Content of Application Package</td>
<td>8</td>
</tr>
<tr>
<td>7.2.2.2</td>
<td>Farming operations</td>
<td>9</td>
</tr>
<tr>
<td>7.2.2.3</td>
<td>Processing and Handling Facilities</td>
<td>9</td>
</tr>
<tr>
<td>7.3</td>
<td>Application Package Review</td>
<td>9</td>
</tr>
<tr>
<td>7.3.1</td>
<td>Organization of APPLICANT for Inspection</td>
<td>11</td>
</tr>
<tr>
<td>7.3.2</td>
<td>Ongoing Audit Monitoring of Records</td>
<td>11</td>
</tr>
<tr>
<td>7.3.3</td>
<td>Time of the Essence</td>
<td>12</td>
</tr>
<tr>
<td>7.3.4</td>
<td>Functions</td>
<td>12</td>
</tr>
<tr>
<td>7.4</td>
<td>Evaluation</td>
<td>13</td>
</tr>
<tr>
<td>7.4.1</td>
<td>Aim of the Evaluation</td>
<td>13</td>
</tr>
<tr>
<td>7.4.2</td>
<td>Onsite Inspection</td>
<td>13</td>
</tr>
<tr>
<td>7.4.3</td>
<td>Laboratory Testing</td>
<td>15</td>
</tr>
<tr>
<td>7.4.4</td>
<td>Production Inputs and Commodity Tracking System</td>
<td>16</td>
</tr>
<tr>
<td>7.4.5</td>
<td>Audit Report</td>
<td>16</td>
</tr>
<tr>
<td>7.4.6</td>
<td>Surveillance</td>
<td>16</td>
</tr>
<tr>
<td>7.4.7</td>
<td>Records</td>
<td>17</td>
</tr>
<tr>
<td>7.4.8</td>
<td>Continuing Support</td>
<td>18</td>
</tr>
<tr>
<td>7.4.9</td>
<td>Ongoing Compliance</td>
<td>19</td>
</tr>
<tr>
<td>7.4.10</td>
<td>Temporary variances</td>
<td>19</td>
</tr>
<tr>
<td>7.4.11</td>
<td>Acceptable and Prohibited Materials</td>
<td>20</td>
</tr>
<tr>
<td>7.4.12</td>
<td>Transition Period</td>
<td>21</td>
</tr>
<tr>
<td>7.4.13</td>
<td>Packaging and Post-Harvest Handling</td>
<td>21</td>
</tr>
<tr>
<td>7.4.14</td>
<td>Processing</td>
<td>21</td>
</tr>
<tr>
<td>7.4.15</td>
<td>Setting the Fee</td>
<td>21</td>
</tr>
<tr>
<td>7.4.16</td>
<td>Propagation Material Non-commercially Available</td>
<td>22</td>
</tr>
<tr>
<td>7.4.17</td>
<td>Ingredients Non-commercially Available</td>
<td>22</td>
</tr>
<tr>
<td>7.5</td>
<td>Granting Certification</td>
<td>22</td>
</tr>
<tr>
<td>7.5.1</td>
<td>Certification Decision</td>
<td>22</td>
</tr>
<tr>
<td>7.5.2</td>
<td>Certification Certificate</td>
<td>23</td>
</tr>
<tr>
<td>7.5.3</td>
<td>Denial of Certification</td>
<td>24</td>
</tr>
<tr>
<td>7.5.4</td>
<td>Continuation of Certification</td>
<td>24</td>
</tr>
<tr>
<td>7.5.6</td>
<td>Conditional Certification</td>
<td>27</td>
</tr>
<tr>
<td>7.5.7</td>
<td>Compliance and Handling of Noncompliance</td>
<td>28</td>
</tr>
</tbody>
</table>
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.
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
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.

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:
  - 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.
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.
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 F07 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
• 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:

<table>
<thead>
<tr>
<th>PREPARED</th>
<th>APPROVED</th>
</tr>
</thead>
<tbody>
<tr>
<td>QUALITY MANAGEMENT RESPONSIBLE</td>
<td>MANAGING DIRECTOR</td>
</tr>
</tbody>
</table>
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.
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;
• 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.
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
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.

<table>
<thead>
<tr>
<th>PREPARED</th>
<th>APPROVED</th>
</tr>
</thead>
<tbody>
<tr>
<td>QUALITY MANAGEMENT RESPONSIBLE</td>
<td>MANAGING DIRECTOR</td>
</tr>
</tbody>
</table>
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.
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,
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.
Samples collected in the initial inspection or during surveillance provide fundamental information for the decision on certification. During the certification period sampling and tests 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.
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:
• 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.
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
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
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)
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
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).
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 Noncompliance.

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
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 Organic Certifier 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.
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

<table>
<thead>
<tr>
<th>PREPARED</th>
<th>APPROVED</th>
</tr>
</thead>
<tbody>
<tr>
<td>QUALITY MANAGEMENT RESPONSIBLE</td>
<td>MANAGING DIRECTOR</td>
</tr>
</tbody>
</table>
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.
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.

The Organic Certifier 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
  - Factors affecting the organic integrity of the product or land.
  - Factors causing risk on the product.
  - Use of inputs which are not allowed by the regulations.
  - Non-Organic product sales as organic.
  - Requirements of regulation or standard not applied
- Frequent minor non-conformances on the same requirement of regulation.
- Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates
- Production process plan not implemented.
- 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:
1. 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:
(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:

1. 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.
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
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
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.

4. If the request is denied, issues a letter to the operation, with a copy to ETKO, stating the reasons for denying reinstatement.
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
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.
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
### NOP CERTIFICATION PROCEDURE

**SUPPORT PROCEDURE FOR ORGANIC CERTIFICATION**

**DOC.NR**: GP 18  
**DATE**: 04.07.2016  
**REV. NR**: 03  
**SAYFA**: 40/40

---

### DEFECTS

<table>
<thead>
<tr>
<th>DEFECT CODE</th>
<th>DECISION</th>
</tr>
</thead>
</table>

#### 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**: B3 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 – INSPECTION REPORT

- **Ensure information duly recorded**: C1 NG
- **Ensure info for change of scope is provided for agricultural units, processes, product as appropriate**: C2 NG
- **Info about field and yield**: C3 NG
- **Info about marketing results**: C4 P
- **Sampling info**: C5 P
- **Ensure inspection findings are summarized with inspection report**: C6 NG
- **Ensure applicable forms are checked and used**: C8 NG

---

### PREPARED

QUALITY MANAGEMENT RESPONSIBLE

### APPROVED

MANAGING DIRECTOR
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.
<table>
<thead>
<tr>
<th>§205.303  Packaged products labeled &quot;100 percent organic&quot; or &quot;organic.&quot;</th>
<th>Applicant Section</th>
<th>ETKO Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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:</td>
<td>YES  NA</td>
<td>YES  No  NA</td>
</tr>
<tr>
<td>(1) The term, &quot;100 percent organic&quot; or &quot;organic,&quot; as applicable, to modify the name of the product;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2) For products labeled &quot;organic,&quot; 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.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3) The term, &quot;organic,&quot; to identify the organic ingredients in multi-ingredient products labeled &quot;100 percent organic&quot;;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4) The USDA seal; and/or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(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</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) Agricultural products in packages described in §205.301(a) and (b) must:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) For products labeled &quot;organic,&quot; identify each organic ingredient in the ingredient statement with the word, &quot;organic,&quot; 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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, &quot;Certified organic by * * *,&quot; 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.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>§205.304  Packaged products labeled &quot;made with organic (specified ingredients or food group(s)).&quot;</th>
<th>Applicant Section</th>
<th>ETKO Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Agricultural products in packages described in §205.301(c) may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product:</td>
<td>YES  NA</td>
<td>YES  No  NA</td>
</tr>
<tr>
<td>(1) The statement:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(i) &quot;Made with organic (specified ingredients)&quot;; Provided, That, the statement does not list more than three organically produced ingredients; or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(ii) &quot;Made with organic (specified food groups)&quot;; 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</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3) The seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) Agricultural products in packages described in §205.301(c) must:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) In the ingredient statement, identify each organic ingredient with the word, &quot;organic,&quot; 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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, &quot;Certified organic by * * *,&quot; or similar phrase, identify the name of the certifying agent that certified the handler of the finished product: Except, That, the business address, Internet address, or telephone</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## §205.305 Multi-ingredient packaged products with less than 70 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 the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced, and

2. If the organically produced ingredients are identified in the ingredient statement, displaying the product's percentage of organic contents on the information panel.

(b) Agricultural products with less than 70 percent organically produced ingredients must not display:

1. 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 feed product;

2. The USDA seal;

3. The seal, logo, or other identifying mark of the certifying agent which certified the production or handling operation producing the raw or processed organic ingredients used in the finished product, Provided, That, such seals or marks are not displayed more prominently than the USDA seal;

4. The word, "organic," or an asterisk or other reference mark which is defined on the package to identify ingredients that are organically produced. Water or salt included as ingredients cannot be identified as organic.

(b) Livestock feed products described in §205.301(e)(1) and (e)(2) must:

1. On the information panel, below the information identifying the handler or processor of the product and proceed 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 container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and: Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.

## §205.308 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “100 percent organic” or...
**Assessment of Label**

**NOP**

<table>
<thead>
<tr>
<th>BELGE NO</th>
<th>OP 01 P 33</th>
</tr>
</thead>
<tbody>
<tr>
<td>TARIH</td>
<td>12.02.2016</td>
</tr>
<tr>
<td>REV. NO</td>
<td>00</td>
</tr>
<tr>
<td>SAYFA</td>
<td>4/4</td>
</tr>
</tbody>
</table>

### Organic Products

- **(a)** Agricultural products in other than packaged form may use the term “100 percent organic” or “organic,” as applicable, to modify the name of the product in retail display, labeling, and display containers. Provided, that, the term “organic,” is used to identify the organic ingredients listed in the ingredient statement.

- **(b)** If the product is prepared in a certified facility, the retail display, labeling, and display containers may use:
  1. The USDA seal; and
  2. The seal, logo, or other identifying mark of the certifying agent that certified the production or handling operation producing the finished product and any other certifying agent which certified operations producing raw organic product or organic ingredients used in the finished product. Provided, that, such seals or marks are not individually displayed more prominently than the USDA seal.

### 205.309 Agricultural products in other than packaged form at the point of sale that are sold, labeled, or represented as “made with organic (specified ingredients or food group(s)).”

- **YES □ NA □**  
- **YES □ No □ NA □**

### 205.310 Agricultural products produced on an exempt or excluded operation.

- **YES □ NA □**  
- **YES □ No □ NA □**

### 205.311 USDA Seal.

- **YES □ NA □**  
- **YES □ No □ NA □**

---

**ETKO APPROVAL** (This section is ETKO use only)

<table>
<thead>
<tr>
<th>Label can be approved</th>
<th>Label cannot be approved; please send updated label to ETKO</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

**Date of Approval:**

**Name and Signature - ETKO Responsible:**

---

Prepared by QMR and Approved by Managing Director
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
Certifying Agent

Certification #

Status

Crops Livestock Handling Wild Crops Grower Group

Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization

2009 Certified
2014 Certified
2044 Certified

No
Yes
Yes

No
No
No

Yes
Yes
No

No
Yes
No

Yes
Yes
No

Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization
Etko - Ecological Farming Controlling Organization

2058
2070
2120
2158
2190
2203
2314
2328
2387
2391
2453
2475
2484
2508
2516
2527
2534
2542
2573
2629
2633
2650
2654
2669
3006
3013
3020
3026
3076
3077
3087
3090
3092
3093
3094
3096
3114
3120
3121
3126
3127
3128
3132
3138
3140
3141
3142
3149
3170
3172
3180
3193
3194
3195

No
Yes
Yes
Yes
No
Yes
Yes
Yes
No
Yes
Yes
Yes
Yes
No
Yes
No
No
Yes
Yes
Yes
Yes
Yes
Yes
No
Yes
Yes
Yes
No
Yes
Yes
Yes
Yes
Yes
Yes
Yes
No
Yes
Yes
Yes
Yes
Yes
Yes

No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
No
Yes
Yes
Yes
Yes
Yes
No
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

No
No
No
Yes
No
No
No
No
Yes
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
No
Yes
No
No
No
No
No
No
No
No
No
No
No
No
No
No

No
No
Yes
No
No
Yes
No
Yes
No
No
No
Yes
No
Yes
No
No
No
Yes
No
Yes
No
No
No
No
Yes
Yes
No
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
No
Yes
No
Yes
Yes
Yes
Yes

Yes
No
Yes
Yes
Yes
Yes
Yes
No
No
No

No
No
No
No
No
No
No
No
No
No

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

No
No
No
No
No
No
No
No
No
No

Yes
No
No
No
Yes
Yes
Yes
No
No
No

Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Surrendered
Surrendered
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified
Certified

Grower Group Size

Last Name

231 Hamza
15 Hermse
Gurdal
Gok
Iscan
360 Kus
Hur
Gultekin
129 Kalkan
Goztepe
14 Taskin
Erensoy
Baydogan
Altay
47 Memur
Ahraz
36 Kalkan
Hamza
Yilmaz
Bali
21 Illeez
Ipek
101 Ertetik
Sahin
Kaner
Kaya
Yildirim
5 Chemodanov
10 Rozinskiy
Danilovich
15 Sojnikow
5 Vlasenko
2 Sergeevich
11 Kasyanenko
9 Tarasyuk
8 Livinskiy
12.00 Sikoza
4 Chemodanov
Potapenko
19.00 Memur
5.00 Sidorovich
17.00 Illeez
2.00 Illeez
5.00 Illeez
5.00 Illeez
Vasilenko
Jungkil
7.00 Vlasenko
Kackhovskiy
Yongmun
Jangjin
6.00 Vladimirovich
4.00 Sidorovich
4.00 Rozinskiy
Bugorskiy
Victorovna
Victorovich

First Name

Operation's Name

Talia
Jan
Arif

Arisu Gida Dis Tic. A.s.
Mezo Ekolojik Urunler
Arif Gurdal Tarim Isletmesi

Vuslat
Nuri
Sedat
Tugce
Ebru
Ender
Sebahattin
Orhan
Mehmet
Vahap Baran
Servet
Hayrettin
Adem
Kerem
Talia
Sukru
Atilla
Tolga
Cafer
Engin
Onur
Ozlem
Atif Yalcin
Cezmi
Vladimir
Dmitriy
Khantsevarov Vasiliy
Jaroslav
Vladimir
Averchenko Stanislav
Kirill
Bogdan
Anatoliy
Valentin
Vladimir
Maria
Mesih
Natalia
Tolga
Tolga
Tolga
Tolga
Alexander
Lee
Vladimir
Alexiy
Kwon
Kim
Kaminskiy Andrey
Natalie
Dmitriy
Evgeniy
Lugovska Victoria
Lytvynov Iurii

Anadolu Etap Tarim Ve Gida Urunleri Amb San Tic As
Ozpa Gida Tarim Hayvancilik Insaat San. Ve Tic. A.S.
Treko Tarim Gida Ic Ve Dis Tic Ltd Sti
Susitas Su Urunleri Ve Sanayi Mamulleri Ihracat Tic As
Asya Meyve Suyu Ve Gida San A.s.
Fine Food Gida San Ve Tic Ihr. Ith. A.s.
Taskin Tarim Ltd. Sti.
Ares Organic Gida
Vahap Baran Baydogan
Oliva Gida Sanayi Tic. Ltd.Sti
Kalkan Organik
Limkon Gida San Ve Tic As
WBT Tarim
Ekoturka TR
Cafer Ipek
Ason Dis Ticaret Limited Sirketi
Dohler Marmara Gıda Sanayi A.s.
Nigella Tarim Hayvancilik Gida Peyzaj İns. San. Tic. Ltd. Sti
Gkm Gida ve Katki Maddeleri San. ve Tic. Ltd. Sti
Spelta Ltd.
Alef Ltd.
Region Agro ltd.
Sibnut Ltd
Ukrainian Food Corporation Llc
Too Proizvodstvenniy Komplex Mol-Tabys
Yugekotop Ltd
Everi ltd.
Grainagro Ltd.
Dnepr2
Polba Pe
El Dorado Oils Llc
Farmeks Tarim Urunleri San Ve Tic Ltd Sti
Sadeko Organic
Ekoturka Ethiopia
Ekoturka Kirghizistan
Ekoturka Kazakhistan
Ekotuka Russia
Rodina Llc
Daehanfeed
Tov Prodexim Ltd
Ekolium Llc
Seomjingang Rose Farm
Janghueng Musangim Co Ltd
Nt Nova ltd.
Art Seed Ltd.
Kazecotrade Ltd.
Ojsc Vinnytsa Oil-and-Fat-Production Plant
Nikmorservices Nikolaev Llc.
Agro Supplies Llc


<table>
<thead>
<tr>
<th>Physical Address</th>
<th>Post Office Address (PO Box)</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>123x555</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antalya Org. Sen 2. Cad No 15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hamarat Merkez Bld. Vedat Office Çiğli Yolu Yaya 8 km</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mersin. Tanus Karayıla 10 Km Kasabik Karşıyaka</td>
<td></td>
<td>Mersin</td>
</tr>
<tr>
<td>Organize san bld 15, caddde no:13 Dostpazarı</td>
<td></td>
<td>Eskişehir</td>
</tr>
<tr>
<td>Post Cıhazası EIP No:24 K:6 D:91 Alacahan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State/Province</td>
<td>Postal Code</td>
<td>Country</td>
</tr>
<tr>
<td>----------------</td>
<td>-------------</td>
<td>---------</td>
</tr>
<tr>
<td>20600 Turkey</td>
<td>+90 258 713 65 00</td>
<td>Turkey</td>
</tr>
<tr>
<td>07190 Turkey</td>
<td>+90 242 258 10 30</td>
<td>Turkey</td>
</tr>
<tr>
<td>09000 Turkey</td>
<td>+90 256 257 20 91</td>
<td>Turkey</td>
</tr>
<tr>
<td>33000 Turkey</td>
<td>+90 324 221 59 61</td>
<td>Turkey</td>
</tr>
<tr>
<td>26000 Turkey</td>
<td>+90 222 416 71 71</td>
<td>Turkey</td>
</tr>
<tr>
<td>35220 Turkey</td>
<td>+90 232 465 19 93</td>
<td>Turkey</td>
</tr>
<tr>
<td>33000 Turkey</td>
<td>+90 324 327 70 37</td>
<td>Turkey</td>
</tr>
<tr>
<td>42550 Turkey</td>
<td>+90 332 473 71 71</td>
<td>Turkey</td>
</tr>
<tr>
<td>35620 Turkey</td>
<td>+90 232 376 70 50</td>
<td>Turkey</td>
</tr>
<tr>
<td>32500 Turkey</td>
<td>+90 246 328 71 81</td>
<td>Turkey</td>
</tr>
<tr>
<td>73002 Ukraine</td>
<td>38055239-0377</td>
<td>Ukraine</td>
</tr>
<tr>
<td>73000 Ukraine</td>
<td>38055241-3361</td>
<td>Ukraine</td>
</tr>
<tr>
<td>2100 Turkey</td>
<td>90416227-2401</td>
<td>Turkey</td>
</tr>
<tr>
<td>2100 Turkey</td>
<td>90416227-2401</td>
<td>Turkey</td>
</tr>
<tr>
<td>2100 Turkey</td>
<td>90416227-2401</td>
<td>Turkey</td>
</tr>
<tr>
<td>2100 Turkey</td>
<td>90416227-2401</td>
<td>Turkey</td>
</tr>
<tr>
<td>2100 Turkey</td>
<td>90416227-2401</td>
<td>Turkey</td>
</tr>
<tr>
<td>53600 Ukraine</td>
<td>380562382-1569</td>
<td>Ukraine</td>
</tr>
<tr>
<td>73000 Ukraine</td>
<td>380-552-414851</td>
<td>Ukraine</td>
</tr>
<tr>
<td>73000 Ukraine</td>
<td>380-95-2772673</td>
<td>Ukraine</td>
</tr>
<tr>
<td>2222 Kazakhstan</td>
<td>+77152461017</td>
<td>Kazakhstan</td>
</tr>
<tr>
<td>54001 Ukraine</td>
<td>+3807372-996</td>
<td>Ukraine</td>
</tr>
<tr>
<td>54017 Ukraine</td>
<td>+380-50-4020003</td>
<td>Ukraine</td>
</tr>
<tr>
<td>55050 Ukraine</td>
<td>+380-50-3393499</td>
<td>Ukraine</td>
</tr>
<tr>
<td>73009 Ukraine</td>
<td>380 676 348399</td>
<td>Ukraine</td>
</tr>
<tr>
<td>54002 Ukraine</td>
<td>+380-50-4937537</td>
<td>Ukraine</td>
</tr>
<tr>
<td>2160 Ukraine</td>
<td>+380-44-2053838</td>
<td>Ukraine</td>
</tr>
<tr>
<td>400201 Korea, Republic of South Korea</td>
<td>8232770-1180</td>
<td>Korea, Republic of South Korea</td>
</tr>
<tr>
<td>73000 Ukraine</td>
<td>+380-50-3372873</td>
<td>Ukraine</td>
</tr>
<tr>
<td>21587 Korea, Republic of South Korea</td>
<td>821883-4764</td>
<td>Korea, Republic of South Korea</td>
</tr>
<tr>
<td>1479 Korea, Republic of South Korea</td>
<td>821837-7753</td>
<td>Korea, Republic of South Korea</td>
</tr>
<tr>
<td>12030 Ukraine</td>
<td>+380-95-7772673</td>
<td>Ukraine</td>
</tr>
<tr>
<td>21034 Ukraine</td>
<td>+380 976 343839</td>
<td>Ukraine</td>
</tr>
<tr>
<td>2160 Ukraine</td>
<td>+380-44-2053838</td>
<td>Ukraine</td>
</tr>
</tbody>
</table>
fruit Aroma, Orange Concentrate, Orange NFC fruit juice, Orange Aroma, Lemon Concentrate, Lemon NFC fruit juice, Lemon Aroma, Mandarin Concentrate, Mandarin NFC fruit juice, Mandarin Aroma, Carrots Concentrate, Carrots Aroma, Black Carrots Concentrate, Black Carrots Aroma, Strawberry Concentrate, Strawberry NFC fruit juice. Apple, Apricot, Black carrots, Carrot, Cherry, Grapefruit, Lemon, Mandarin, Orange, Peach, Pears, Pomegranate, Quince, Sour cherry, Strawberry and Tomatoes Aroma.

Beans, Rice, Dried Sesame, Dried Figs, Dried Apricots, Dried Grape, Dried Plum, Dried Mulberry

Durum Wheat Concentrate

Garlic, Fresh Celery, Fresh Leek, Fresh Gold Strawberry, Fresh Stuffed Pepper, Cayenne Pepper, Fresh Melon, Fresh Watermelon, Fresh Onion, Fresh Garlic, Fresh Corn, Fresh Spinach, Fresh Broccoli, Fresh Cauliflower, Fresh Peas, Organic Turmeric, Organic Tomato Sauce, Organic Hot Sauce, Organic Eggplant with Basil Sauce, Organic Apple Vinegar


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

jar, Organic home-made pasta, Grape Vinegar, Boiled Grape Juice, Mixed pickles, Dried Tomatoes, Dried Golden Berry, Boiled Apple juices


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 procedures and results of the training as proof of corrective actions.

Sincerely

Mustafa Akyuz
ETKO Turkey

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: AIAinbox@ams.usda.gov; Renee.Mann@ams.usda.gov; RobertH.Yang@ams.usda.gov
Subject: 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
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
**Program**

**Day 1 - 06 July/Temmuz 2015 Monday/Pazartesi**

<table>
<thead>
<tr>
<th>Time</th>
<th>Trainor</th>
<th>Subject</th>
<th>Procedures</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>09.30 – 10.00</td>
<td>MA</td>
<td>NOP, COR and IACB StandardNOP, COR ve IACB Standardı hakkında bilgilendirme</td>
<td>OP 01</td>
<td>Introduction, purpose, expectations</td>
</tr>
<tr>
<td>10.00 – 12.30</td>
<td>FA</td>
<td>IACB Standards; NOP, COR Regulation - Eşdeğer IACB Standardsı ve NOP, COR Yönetmeliği</td>
<td>GP 18</td>
<td>Explaining general system changes, important aspects Agriculture, Process and Wild collection. Ziraat, Doğal toplama ve 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</td>
</tr>
<tr>
<td>12.30 – 13.30</td>
<td>Break</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13.30 – 14.00</td>
<td>MA</td>
<td>ETKO Inspection &amp; Certification Procedures OP 01</td>
<td></td>
<td>Updated inspection and certification documents</td>
</tr>
<tr>
<td>14.00 – 14.30</td>
<td>YY</td>
<td>OP 03 Testing, Ti 05 Sampling Method, Ti 40 NOP Guide Testing &amp; Enforcement Action</td>
<td></td>
<td>How to take samples, transport, laboratories, what to analyze, assessment of the results</td>
</tr>
<tr>
<td>14.30 – 15.00</td>
<td>MA</td>
<td>Risk analyses, Investigation of irregularities, unannounced inspections</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15.00 – 15.15</td>
<td>Break</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15.15 – 15.45</td>
<td>BG</td>
<td>Label assessment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15.45 – 17.00</td>
<td></td>
<td>Workshops</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17.00 – 18.00</td>
<td></td>
<td>Presentation of workshop results</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Day2 - 07 July/Temmuz 2015 Tuesday/Sali**
<table>
<thead>
<tr>
<th>Time</th>
<th>Country</th>
<th>Topic</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>09.00 – 10.30</td>
<td>MA FA, ES SY YY BG ID HK ..</td>
<td>ETKO NOP Certification Procedure GP 18. ETKO Nop Sertifikasyon Prosedürü GP18.</td>
<td>Following topics will be explained: 1-How to use Regulations. (MA) 2-Labelling and label approval (BG) 3-National List 205&amp;600-606 (YY) 4-Organic production and handling system plan 205&amp;201 (FA) 5-Land requirements 205&amp;202, buffer zone practice (ES) 6-Soil fertility and crop nutrient management 205&amp;203 (HK) 7-Seeds and planting stock 205&amp;204 (ID) 8-Crop rotation standard 205&amp;205 (ID) 9-Pest, weed and disease management 205&amp;206 (YY) 10-Wild crop harvesting 205&amp;207, (SY) 11-Buffer zone practice will be studied and buffer zone evaluations will be made onsite. Inspectors will be monitored for this practice.</td>
</tr>
<tr>
<td>10.30 – 10.45</td>
<td></td>
<td>Break</td>
<td></td>
</tr>
<tr>
<td>10.45 – 12.30</td>
<td>MA</td>
<td>NOP Adverse Action Procedure: 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</td>
<td>National Organic Program. These documents will be translated in Turkish in order to provide better understanding of the procedures by involved ETKO stuff members.</td>
</tr>
<tr>
<td>12.30 – 13.30</td>
<td></td>
<td>BREAK</td>
<td></td>
</tr>
<tr>
<td>13.30 - 15.00</td>
<td>SY</td>
<td>Grower Groups Inspection</td>
<td>What is the structure of a grower group, what aspects are the most important for inspection, how to do a grower group inspection</td>
</tr>
<tr>
<td>15.00 – 15.15</td>
<td></td>
<td>BREAK</td>
<td></td>
</tr>
<tr>
<td>15.15 – 16.30</td>
<td></td>
<td>Workshops</td>
<td>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.</td>
</tr>
<tr>
<td>16.30 – 17.00</td>
<td></td>
<td>Presentation of workshop results</td>
<td></td>
</tr>
<tr>
<td>17.00 – 18.00</td>
<td></td>
<td>Test</td>
<td></td>
</tr>
</tbody>
</table>

**Day3 - 08 July/Temmuz 2015 Wednesday/Çarşamba Onsite inspection Agriculture NOP/COR/IACB**
09.00 – 19.00   Agriculture inspection. Treko/Arısu

**Day 4-09 July/Temmuz 2015 Thursday/Perşembe Onsite Inspection Training Process NOP/COR/IACB**

09.00 – 19.00   Processing inspection Arısu
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

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) [redacted]

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
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: [D] (6) 

Join the NOP mailing list

---

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

---

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: (D) (6)

Join the NOP mailing list

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

Click here to send a Registered Email® message to anyone.
Dear Anne, Bridget

ETKO does not certify production of mentioned systems for NOP.

Hope this information is helpful.

Have a nice weekend.

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606
F: +90-232-3397607
www.etko.org

---

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.

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

Mario it appears this revocation was sent to the AIA inbox in error it should have been sent to NOPPACAAverseActions@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

Hi Cheri and Renee,

Here is a revocation to be assigned.

Regards,

Mario Essig
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
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

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

Click here to send a Registered Email® message to anyone.
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 preventative 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 nonconformances.

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 V. 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

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

Organizational Structure:
The Ecological Farming Control Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification for ETKO is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities.
ETKO was initially accredited as a certifying agent on January 22, 2003 to the USDA National Organic Program (NOP) for crops, wild crops, and handling. ETKO currently certifies operations to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine. As of May 2014, ETKO’s NOP client list had 40 certified operations with 22 crops, 3 wild crops, and 39 handling operations. ETKO certifies to the Turkish Organic Standard under the legal authority of the Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and 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.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 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.
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

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

Click here to send a Registered Email® message to anyone.
NOTICE OF NONCOMPLIANCE

JUN 2 1 2016

Mustafa Akyuz
ETKO EKOLOGIC 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 recurrences. 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.
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,

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

cc: NOP Appeals  
    AIA Inbox