

APPLICATION FORM 160 Sokak 13/3 35040 Bornova – İzmir Tel: +90-232-3397606, Fax: 3397607, info@etko.org		Doc Nr	GP 01 F 01
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Name Applicant			
Address			
Invoice Information			
Tel/Fax/Mobile Phone			
e-mail /website			
Applicant contact person		*Signature	
Date			

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

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

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

Turkish ☐ English ☐ French ☐ Russian ☐ Romanian ☐
Bulgarian ☐ Arabic ☐ Serbian ☐ Persian ☐ Other: ☐

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

2- Relationship with Other Certification Bodies:				YES <input type="checkbox"/> NO <input type="checkbox"/> NA <input type="checkbox"/>	
Indicate below according to which regulation / standard you were certified					
Regulation	EU/Equivalent IACB	NOP	COR	TC 27676	Other:
Name of the Certifier					
Certificates issued					
Indicate if your application / certification was denied / refused / sanctioned					
Explain reason of denial / sanction					
Indicate corrective actions taken					

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

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

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

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

12-Parallel Production:			
12.1 Plant Production. Check for compliance IACB 6.3.1. Indicate if you have parallel production for perennial crops which cultivation period covers minimum 3 years. Parallel production means a producer may run organic and non-organic production units in the same area. If YES complete following table: IMPORTANT: Parallel Cropping is not allowed for Annual Crops			
Crops	Varieties	Ha	Harvesting date

12.2-Livestock. Check for compliance IACB 6.3.2					
Type of livestock	Number of livestock	The rearing area is separate	Non-organic animal is kept in organic pasturage	Organic animal is kept in a common land	During transfer when they move organic animal is kept in non-organic land

12.3 Beekeeping: Check for compliance IACB 6.3.2. For any climatic, geographical or structural constraints and, for the purpose of pollination actions an operator may run organic and non-organic beekeeping units on the same holding provided that all the requirements of the organic production rules are fulfilled, with the exception of the provisions for the siting of the apiaries. If this is the case complete following table:			
Number of hives	Reason of parallel production	Expected harvest time	Estimated quantity of products

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

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

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

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

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

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11	Ownership document of the fields, rental agreement, Title Deeds something comparable.
12	Farm / Processing facility registration document
13	Organic system plan

17-DECLARATION by The APPLICANT

By submitting this application for certification, the applicant acknowledges that he/she must comply with the applicable organic production and handling standards as defined by the Regulations 834/2007 & 889/2008 (Art.63) and / or Equivalence to Reg. 834/2007 and 889/2008 (point A.5.6.) and / or USDA National Organic Program, Final Rule and must submit an organic production and handling system plan according to the requirements outlined in §205.201 of the NOP Final Rule.

The applicant may withdraw the application prior to issuance of a notice of non-compliance and in this case will neither receive a notice of non-compliance nor a denial of certification. However, the applicant still must bear all costs for all services that have been delivered until the withdrawal.

If the application for certification is accepted, the applicant must sign the ETKO inspection contract in which all deeds and obligations are specified before the inspection and certification procedure can be continued.

18-Checklist: Please check following points and make sure they are all in place before you make this application.

Do you have those mentioned Regulations in your operation?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Did you check carefully your products are in compliance with those mentioned Regulations?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Did you identify any breach of the Regulations related to your products, ingredients etc.?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Did you take corrective measures in case you identified any problems with your products for compliance?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Do you guarantee your products are in compliance with the mentioned Regulations above?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Did you set up your Quality Management System and system in compliance with the mentioned Regulations /Standards? If not prepared yet, you must provide minimum "Organic Compliance Plan" during the application phase.	YES <input type="checkbox"/>	NO <input type="checkbox"/>

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Operator			
Address			
City-Country			
Authorized person			
Tax Number (for invoice)			
Tel /fax - e mail			
Scope Applicable Regulation / Standards	TC 27676/2010 <input type="checkbox"/>	COR (Canada) <input type="checkbox"/>	COSMOS <input type="checkbox"/>
	IACB EU Equivalent Standard <input type="checkbox"/>	NOP <input type="checkbox"/>	Other, specify <input type="checkbox"/>

This contract is signed between ETKO as Certification Body and OPERATOR who is certified by ETKO.

A - This contract is applicable for organic production and processing activities:

Validity: This contract is valid until cancelled and prolonged automatically one more year if not cancelled at least 6 weeks before the annum.

NOP Specific Validity of certification: When the OPERATOR once certified, their certification remains in effect until surrendered by the organic operation or suspended or revoked by ETKO or the State official. Therefore the contract is valid until surrendered by the organic operation or suspended or revoked by ETKO or the State Official.

Therefore the OPERATOR and ETKO hereby agree:

B - Certification Agreement

- ETKO shall supply to the OPERATOR Organic Production Regulations and/or Standards on the website which are applicable for the establishment of an operation adequate to meet the requirements.
- The rights and obligations of this agreement are not assignable by the OPERATOR, whether in conjunction with the sale or transfer of the whole or any part of the OPERATOR's business. The OPERATOR shall not delegate or assign the right to use the Mark to any other individual, firm, group or institution.
- The OPERATOR shall maintain in good order all records including stock and financial records which enable ETKO to verify conformity of organic products. Files have also to contain the nonorganic products produced or sold by the OPERATOR. All record of the OPERATOR shall be made freely available to ETKO for inspection and audit on an annual basis.
- The OPERATOR shall document procedures/instructions describing the methods needed to ensure and control the organic integrity in production and processing where the absence of such documents could have adverse effects on organic quality. Operator shall establish and update appropriate procedures based on a systematic identification of critical processing steps and shall comply with and implement the procedures In particular, operator: 889-A26 2: 889-A26.4
 - Take precautionary measures to avoid the risk of contamination by unauthorized substances or products;
 - Implement suitable cleaning measures, monitor their effectiveness and record these operations;
 - Guarantee that non---organic products are not placed on the market with an indication referring to the organic production method
- The OPERATOR shall supply to ETKO as completely as possible all information requested pertaining to production practices and/or processing operations of the OPERATOR. Such information may include but not be limited to the following:
 - In Agriculture; crop rotations, use of pesticides, any other farm inputs such as propagation material, fertilizers, sanitizers, harvest results, product flow and reconciliation.
 - In processing operations, packaging and labeling operations, production practices, pest-rodent control, sanitary activities, and precautionary measures base of risk assessment to keep organic integrity of the products, storage and other handling activities, Mass-balance and marketing activities, records.
- ETKO shall issue certificates designated Transaction/Inspection Certificate upon request of the OPERATOR. Issuance of said certificates will be at the sole discretion of ETKO and will be issued only when accompanied by required verification and remittance of proper fee.
- OPERATOR shall promptly remit fees and charges as established by ETKO schedule of fees and charges. Violation of this rule may result in suspension or cancellation of the certification.
- Failure to comply with the APPLICABLE Regulation(s) / Standards and terms and conditions of this contract shall be just cause for revocation of rights of the OPERATOR as conferred by this agreement.
- ETKO shall not be liable for any act of omission or commission or violation of APPLICABLE Regulation(s) / Standards, rules, or by laws of ETKO by the OPERATOR, their related parties, successors and assignees and the OPERATOR shall hold harmless ETKO in all matters relating to this agreement.
- ETKO will supply to the OPERATOR conformed examples of the mark suitable for use in all printed matter and advertisements with respect to the certified products. The OPERATOR agrees that all uses of the Mark, with the

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exception of those labels provided by ETKO, will be submitted for written approval and must receive written approval prior to the use of the Mark.

11. The OPERATOR may have been certified by another accredited certifier. This certification status may be accepted by ETKO on condition that the prior certification is evaluated by ETKO as per relevant procedures. In case prior certification is accepted by ETKO the term of this agreement and all rights granted will be valid automatically. OPERATOR may only use ETKO mark and/or logo upon successful application and evaluation of ETKO.
12. ETKO and the OPERATOR shall have the right to terminate this agreement with cause upon written notice. Upon termination of this agreement the OPERATOR agrees to discontinue the use of the Mark and return the outstanding certification documents issued.
13. In recognition of changing Regulations and/or Standards, OPERATOR will undertake whatever steps may, in ETKO's judgment, be necessary as the result of legal or regulatory decisions affecting the APPLICABLE Regulation(s) / Standards of production or Mark.
14. All information acquired by ETKO regarding operations of the OPERATOR shall not be disclosed by ETKO to any employee or consultant or contractor unless they are bound by a confidentiality agreement. ETKO shall have no obligation with respect to non-disclosure of the above information if such information is public domain, is previously known to ETKO or its agents or has been obtained in good faith from a third party not under obligation of secrecy.
15. OPERATOR shall be informed of information provided when required by the law and all other times that information not be disclosed without consent of the OPERATOR. ^{4.5.2} Information about the OPERATOR obtained from sources other than the OPERATOR (e.g. complainant, regulators) treated as confidential. ^{4.5.3}
16. ETKO has the right to make surveillance and announced or unannounced inspections when it is needed. OPERATOR should open whole documents related to the certification to ETKO inspectors.
17. Operator should fulfill described non conformances within a decided time period. If needed ETKO organize surveillance inspections to approve correction actions.
18. Projects which cover several small farm holders and processors need to sign an agreement with the ICS/Project indicating that they follow rules of ICS program and organic regulation rules. Maintenance of field records by individual farm members or by the project is a requirement of certification and will be verified during inspection.
19. OPERATOR accepts that ETKO may at any time use subcontracted services and obtain their consent. ETKO informs the OPERATOR in advance of outsourcing activities, in order to provide the OPERATOR with an opportunity to object. ^{6.2.2.4.f}
20. Upon suspension or cancellation of certification, the OPERATOR discontinues its use of all advertising matter that contains any reference there to. Also the certificate and certification documents are returned back.
21. The OPERATOR is required to ensure compliance to the requirements of relevant regulation(s) and standard(s), and is responsible to ensure that the organic production / processes are in accordance with the requirements of organic production regulation(s) and standard(s). OPERATOR must avoid from any non-compliance and make sure all related parties such as subcontracted producers, processors and other persons to follow and comply the requirements of organic regulation(s) and standard(s). In the case where activities related to organic certification are done by subcontractors there are agreements in place. OPERATOR must ensure subcontracted producer and processors compliance to the valid production standards / regulations with an agreement signed among them. In some cases some steps in the production chain may have been inspected by other certification bodies. Nevertheless ETKO will also inspect these production units by applying its own procedures and organic regulations. OPERATOR is responsible to submit the procedures and policies to its subcontracted facility that he has obtained from ETKO.
22. The labels and logo to be used on organic products will comply to the use of label and logo requirements of the relevant regulation(s) and standard(s) in relation to the certification programs applied (TC, EU, NOP, COR, BIOSUISSE, COSMOS or any other) The OPERATOR accepts the criteria defined in ETKO Guide and/or Standard(s) Labeling Guide(s) for Use of Logo and Labels. It is subject to the sanctions defined not only by ETKO Procedures but also in the relevant regulation(s) and/or standard(s), in case a related nonconformity is observed. Logo and labels indicating organic product can only be used on the products produced in compliance with the requirements stated in relevant regulation(s) and/or standard(s). The OPERATOR is responsible for the non-compliances and related legal issues due to the misuse or false use of organic logo and or labels. *According to Turkish Organic Regulations the OPERATOR can use TC Logo on the products only to be marketed in Turkey. The organic product not having logo on it indicating that it is produced organically can not be supplied or marketed as organic in Turkey, or patented with prefixed or suffixed names. The use of logo/labels on the products to be exported is not enforced by TC regulation.*
23. OPERATOR must provide logo/labels to ETKO for approval before use for the packages of organic products. On the label of the product, which is not produced organically in accordance with the requirements of the organic regulation(s) and/or standard(s), any declaration meaning or evoking that the product has been produced, processed, handled, packed or stored in according to organic regulation(s) and/or standard(s), is not permitted. The shape, packaging, or label of non-organic product cannot be similar to shape, packaging or label of organically produced product, or evoking that it is organic. Such products cannot be registered, branded or patented as organically produced products. Pre-fixes or suffixes such as bio, biyo, eco, eko, org suggesting that the product is organic cannot be used for the non-organic products.

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24. Related to EC, TC Organic Production Regulations when in conversion to organic farming crops will be labeled, labels prepared must not evoke the consumers that product is organic. The product must be labeled as required by these regulations and standards such as "In Conversion to Organic Product". Organic term must not be predominant then In Conversion as using different fonts, colors, and sizes. Use of false or misleading terms and figures leads to major non conformances and must be corrected within a time period classified by ETKO, in case this non-compliances cannot be corrected, certification will be cancelled. Official logos are not allowed to be used for in-conversion products labeling.

25. The OPERATOR comply at least, with the following: 4.1.2.2

a) The OPERATOR always fulfils the certification requirements, including implementing appropriate changes when they are communicated by the ETKO;

b) If the certification applies to ongoing production, the certified product continues to fulfil the product requirements;

c) The OPERATOR shall allow ETKO inspector in charge, accreditation body and state officials' representatives from the Accreditation Advisory Body to access during normal working hours, documentation and sites used to produce certified products, for the purposes of examination and copying within as part of accredited certifier assessment. The OPERATOR is responsible making all necessary arrangements to disclose all relevant documents and records in normal working hours during an audit in regard for regular/unannounced, irregularity and/or complaint investigation audits the OPERATOR shall:

- Provide sufficient information to auditors, proving that production processes comply with the relevant requirements.
- Ensure the access to the facilities, records, personnel enabling the auditors satisfactorily verify that organic production systems and processes are maintained.
- Maintain the records of organic production at least for 5 years.
- This agreement provides both ETKO and the responsible authorities the right of access to all appropriate facilities, including to non-organic production in the unit or related units, and all relevant personnel, documentation and records, including financial records.
- If the OPERATOR provides copies of the certification documents to others, the documents shall be reproduced in their entirety or as specified in the certification scheme;
- In making reference to its product certification in communication media such as documents, brochures or advertising, the OPERATOR complies with the requirements of ETKO or as specified by the certification scheme;
- The OPERATOR makes all necessary arrangements for: 1) the conduct of the evaluation and surveillance (if required), including provision for examining documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and OPERATOR's subcontractors; 2) investigation of complaints; 3) the participation of observers, if applicable;
- OPERATOR keeps a record of all complaints made known to the OPERATOR relating to the compliance with certification requirements and to make these records available to the ETKO when requested; and
 - takes appropriate action with respect to such complaints and any deficiencies found in products that affect compliance with the requirements for certification,
 - documents the actions taken

d) The OPERATOR makes claims regarding certification consistent with the scope of certification; **the operator does not put up for sale any product "represented as organic" or bearing the word organic or its derivatives until it has been informed by the CB that the products are certified.**

e) The OPERATOR does not use its product certification in such a manner as to bring the ETKO into disrepute and does not make any statement regarding its product certification that ETKO may consider misleading or unauthorized;

f) OPERATOR accepts, in the event of infringement or irregularities, the enforcement of the measures of the organic production rules. Upon suspension, withdrawal, or termination of certification, the OPERATOR discontinues its use of all advertising matter that contains any reference thereto and takes action as required by the certification scheme (e.g. the return of certification documents) and takes any other required measure;

g) If the OPERATOR provides copies of the certification documents to others, the documents shall be reproduced in their entirety or as specified in the certification scheme;

h) in making reference to its product certification in communication media such as documents, brochures or advertising, the OPERATOR complies with the requirements of the ETKO or as specified by the certification scheme;

i) The OPERATOR complies with any requirements that may be prescribed in the certification scheme relating to the use of marks of conformity, and on information related to the product;

j) The OPERATOR keeps a record of all complaints made known to it relating to compliance with certification requirements and makes these records available to the ETKO when requested, and

1) Takes appropriate action with respect to such complaints and any deficiencies found in products that affect compliance with the requirements for certification;

2) Documents the actions taken;

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k) The OPERATOR informs ETKO, without delay, of changes that may affect its ability to conform to the certification requirements.

NOTE Examples of changes can include the following:

The legal, commercial, organizational status or ownership,
Organization and management (e.g. key managerial, decision-making or technical staff),
Modifications to the product or the production method,
Contact address and production sites,
Major changes to the quality management system.

26. The operator (processor, producer, importer, etc.) may process or use certified products, ingredients or inputs under the Organic Regulation(s) and/or Standard(s) he is seeking certification for. It is under the responsibility of the operator that the certified materials he intends to use should be allowed according to which Regulation(s) and/or Standard(s) he works. ETKO will verify during the inspection the correct organic materials used. (Example: Operators seeking COR or NOP certification must use products certified according to the COR or NOP)
27. In cases where the operator and/or the subcontractors of that operator are checked by different control authorities or control bodies in accordance with the control system set up by the authorities concerned, producer allows ETKO to exchange information with other approved Certification Bodies and authorities (competent authorities, approval bodies or accreditation bodies) ^{(889-6.3.2.g) (392/13.5)} including the Private Standard related management authorities such as "COSMOS-standard AISBL", or other Standard owners to verify information, especially the certification status of certified products, as part of its ongoing evaluation;
28. The operator;
- to accept, in cases where the operator and/or the subcontractors of that operator change their control body/authority, the transmission of their control files to the subsequent control authority / body ^(889-6.3.2.e) to accept, in cases where the operator withdraws from the control system, to inform without delay the relevant competent authority and ETKO ^(889-6.3.2.f).
 - to accept, in cases where the operator withdraws from the control system, that the control file is kept for a period of at least five years ^(889-6.3.2.g).
 - to accept to inform ETKO without delay of any irregularity or infringement affecting the organic status of their product or organic products received from other operators or subcontractors ^{(889-6.3.2.h) 392/13.3}
 - declares that he/she performs according to the organic rules, including the acceptance of enforcement of measures in case of infringements and irregularities. ^{392/13.4}
29. ETKO will provide OPERATOR following documents as a part of the application procedure. GP 10 ETKO "Certification Services", TI 14 ETKO Fee Structure and APPLICABLE Regulation(s) and/or Standard(s)
30. Should any provision of this agreement be held by a court of law to be in conflict of rule of law, statute or APPLICABLE Regulation(s) and/or Standard(s), the remaining provisions will not be affected thereby.

C - Surveillance Audits:

After the initial inspection ETKO conducts surveillance inspections according to the content of the project anytime is needed. Frequency of the inspection visits depends on the products, production and processing practices. Frequency of the surveillance inspections may be informed to certified operations after the initial inspection. Unannounced inspection visits is required according to the Organic Production Regulations, therefore OPERATOR accepts and make use of all necessary documents and show all production and processing facilities during the unannounced inspections. The OPERATOR is responsible to pay the extra costs due to surveillance/unannounced audits.

ETKO guarantees its OPERATORS to do a good service related to its responsibilities.

ETKO and the OPERATOR declare that they accept the terms and conditions of this agreement. When a disagreement appears applications will be done to Trade Court of Izmir.

ETKO and the operator can cancel this contract by a written notification explaining the reason. Operator accepts to return certification documents and stop using certification marks.

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D.FEES

The annual contribution to be paid by the OPERATOR is described with a Cost Estimate and basically calculated as follows:
The basic amount is considered as working man/day payment for the inspection and certification process and administration work which are described in ETKO Fee Schedule.

OPERATOR must confirm acceptance of Cost Estimate before signing this Contract.

ETKO may send more than one inspector at once when it is needed.

Payment Conditions

The annual contribution for **201x** will be **xxxx EURO**. The amount of the year will be invoiced based on the inspection, certification and the administration work: OPERATOR accept payment conditions as described below:

xxxx EURO will be paid xx.xx.xxxx

OPERATOR must burn the transfer cost charged by the sending and receiving banks.

Payments must clearly indicate "Name of the company or person" who transfer the money and "the reason of the payment"

ETKO reserves the right to adjust the amounts stated above each calendar year.

The OPERATOR agrees to pay latest within 30 days after the date mentioned above and complete the payments before delivering the inspection results and any decision taken by ETKO.

The OPERATOR who is not meeting the criteria as stated above will be subject to paying a compensation for the costs of interest (3 % a month), cancellation(s) and the collecting charges, if any. When two weeks or less before the inspection visit was scheduled no payments were received the inspection might be cancelled by ETKO. In case of cancellations by the OPERATOR or cancellations by ETKO due to no-payment of the OPERATOR the following costs will be charged:

Cancellation earlier than two weeks before the planned inspection: 15 % of the concerning invoice amount + if applicable, the cost made for your inspection visit, like flight ticket, visa, vaccinations etc.


Cancellation within two weeks or less before the planned inspection: 50 % of the concerning invoice amount + if applicable, the cost made for your inspection visit, like flight ticket, visa, vaccinations etc.

The date of the inspection visit is communicated to you by ETKO in writing.

Part A, B, C, D of this contract are understood and acknowledged:

Signature and Stamp

OPERATOR Representative	
Date:	
ETKO Representative	
Date:	

	APPLICATION PACKAGE REVIEW FORM BAŞVURU PAKETİ DEĞERLENDİRME FORMU Organik - Organic		BELGE NO	GP 02 F 01
			TARİH	01.08.2016
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Name of applicant Başvuru Sahibi firma			
License No Lisans No		Date / Tarih	
Address Adres			
Tel/Fax / Telefon- Fax Email / Website			
Contact person Yetkili kişi			
Review made by Değerlendirmeyi yapan			

Initial Inspection İlk Kontrol <input type="checkbox"/>	Surveillance Inspection Takip Kontrol <input type="checkbox"/>	No:
Recertification yes <input type="checkbox"/> no <input type="checkbox"/>		

Following documents and informations are present: <i>Aşağıda adı geçen dokümanlar ve bilgiler başvuran tarafından iletilmiştir</i>	(Yes) (Evet)	(No) (Hayır)	N/A G/D
Information on the applicant (General background, involvement, product range etc. certification bodies worked with): Başvuran hakkında genel bilgiler (geçmişi, kapsam, ürünler vb.)			
The scope of certification program concerned: Sertifikasyon programının kapsamı ve ilgili olan konuları			
Explanation of the agricultural (plant or animal) production: Tarımsal üretiminizi (bitkisel veya hayvansal) açıklayınız.			
Explanation of the processing crop by crop (processing flow chart): Ürünlerin işlenmesini açıklayınız (Ürünler nerede, nasıl, hangi şartlar altında işlenecek vs. bilgiler)			
Agricultural units: Zirai Üniteler Farming system: Ziraat Şekli			
Animal production (Ranges, Poultry, Fish Ponds, Bird cages etc): Hayvan yetiştirme (çeşit, kümes hayvanları, balık havuzları, kuş kafesleri vs)			
Natural Collection Areas (Forestry or wild crops) Doğal toplama alanları (orman ya da doğal ürünler)			
Processing units /İşletmeler			
Products: Ürünler			

Following documents should be prepared and submitted to ETKO before inspection Aşağıdaki dokümanların kontrol öncesinde hazırlanması ve ETKO'ya ulaştırılması gerekmektedir.			
The last inspection report of the previous inspection body (if any). Müteşebbis şayet başka bir kontrol firmasıyla çalışmış ise en son kontrol raporu			
Actions required from previous certification and respective corrective measures. <u>Şayet daha önceden verilmiş herhangi bir uygunsuzluk var ise ve buna ilişkin düzeltici faaliyetler mevcut ise</u>			
<u>Client's application and/or certification has been denied by any certifier before applying to ETKO? And/or any pending non compliances are present? Başvuru sahibinin sertifikasyonu ve/veya başvurusu daha önceden reddedilmişmi? Veya açıkta olan uygunsuzluklar mevcutmu?</u>			
Registration chamber of commerce or something comparable. Müteşebbisin Ticaret Odası kayıt belgesi			
Farmer list and agreements.			


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Üretici listeleri ve anlaşmaları	
Internal Assessment Documents/OCP Reports completed and approved. İç Denetim Raporları / OUP onaylanmıştır	
Maps (Overview, Detailed). Detaylı ve genel haritalar	
Processor Agreements. İşletmecilerle yapılan anlaşma	
Processing facility plan and Process Flowcharts. İşletme yerleşim planı ve ürün işleme akış şemaları	
Processing aids list (if any) Yardımcı ürün işleme maddeleri (geçerli ise)	
List of ingredients (for cases with processing) Kullanılan ingredientler (var ise)	
GMO Declarations (if any) Genetik modifikasyondan temizdir belgesi (geçerli ise)	
Propagation material approvals Üretim materyali onaylanmalı	
Retroactive recognition of former farming system procedure is completed correctly? Geçiş süreci kısaltmasıyla ilgili prosedürler tamamlanmış mı? T1 33 F 01	
Certified inputs (if any) such as fertilizers, pest management materials etc. Sertifikalı girdi maddleri. (Gübre, ilaç vs gibi)	
Total Yes/No Toplam Evet /Hayır	
Comments: Yorumlar 	
Assigned inspector Atanan Denetmen*	
All related documents are present in the application package therefore inspection can be planned. Denetim için gerekli bütün araçlar başvuru paketinde mevcuttur o nedenle denetim planlanabilir.	
ETKO is able to do certification for the applied scope and has resources to realize it. Applicant's documents are kept in clients file. Başvuru yapılan konuda ETKO'nun yetkisi veya yeterliliği mevcut olup başvuru Kabul Edilmiştir. Başvuru belgeleri müşteri dosyasında saklanır.	
ETKO is not able to accept this application because of the accreditation scope does not cover it or has not enough resources to realize this audit. Başvuru yapılan konuda ETKO'nun yetkisi veya yeterliliği mevcut olmadığından başvuru Kabul edilemez ve başvuru sahibine yazılı ile bildirilir.	

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

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

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

		ONAYLI TAŞERON KURULUŞ LİSTESİ – APPROVED LABORATORY LIST				Doküman No	GP 06 F 02
						Rev TARİH	01.07.2016
						REV. NR	03
LABORATUVAR ADI LABORATUARY NAME		2015 PUANI 2015 SCORE	2016 PUANI 2016 SCORE	2017 PUANI 2017 SCORE	ANALİZ TİPİ TYPE OF ANALYSIS	YETKİLİ KİŞİ - CONTACT PERSON	TELEFON
							TELEPHONE
1	ARGEFAR	87,17			Pestisit, Antibiyotik, Şeker	Prof. Dr. Ercüment Karasulu	0 232 339 21 60
2	SGS(MRL, MSM)	76,92			Pestisit, GMO,Glyphosate	Ali Duran	0 324 328 15 96
3	A&G PUR	79,48			Pestisit, GMO, Şeker,	Mert Demircioğlu	0 232 486 8383
4	EKOSYMRNA-ECOSUR	84,84			Pestisit, GMO	Nur Altuğ	0 232 492 00 81
5	EUROFINS	76,92			Pestisit, GMO	Kayhan Mucuk	49 30 677 985 638
6	INTERTEK	94,87			Pestisit, Glyphosate, Tekstil Ağır metal-Formaldehid	Onur Ok	236 302 0000
7	TEKAUM-EGE UNIVERSİTESİ TEKSTİL VE KONFEKSİYON ARAŞTIRMA UYGULAMA MERKEZİ	93,3			TEKSTİL KİMYASALLARI MSDS	prof. Dr. Faruk Bozdoğan	0 232 388 78 59
8	COSMING	80			KOZMETİK-Aerobik Mezofilik Bakteri Sayımı Küf ve Maya Sayımı	Aylin Kahrıman	0 232 431 11 21
9	EGE CHELAB		78,5		Pestisit	Yasemin Hançer	0232 328 28 44
10							
11							
Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür							

		ONAYLI TAŞERON KURULUŞ LİSTESİ – APPROVED LABORATORY LIST				Doküman No	GP 06 F 02
						Rev TARİH	17.11.2016
						REV. NR	04
LABORATUVAR ADI LABORATUARY NAME		2015 PUANI 2015 SCORE	2016 PUANI 2016 SCORE	2017 PUANI 2017 SCORE	ANALİZ TİPİ TYPE OF ANALYSIS	YETKİLİ KİŞİ - CONTACT PERSON	TELEFON
							TELEPHONE
1	ARGEFAR	87,17			Pestisit, Antibiyotik, Şeker	Prof. Dr. Ercüment Karasulu	0 232 339 21 60
2	SGS(MRL, MSM)	76,92			Pestisit, GMO,Glyphosate	Ali Duran	0 324 328 15 96
3	A&G PUR	79,48			Pestisit, GMO, Şeker,	Mert Demircioğlu	0 232 486 8383
4	EKOSYMRNA-ECOSUR	84,84			Pestisit, GMO	Nur Altuğ	0 232 492 00 81
5	EUROFINS	76,92			Pestisit, GMO	Kayhan Mucuk	49 30 677 985 638
6	INTERTEK	94,87			Pestisit, Glyphosate, Tekstil Ağır metal-Formaldehid	Onur Ok	236 302 0000
7	TEKAUM-EGE UNIVERSİTESİ TEKSTİL VE KONFEKSİYON ARAŞTIRMA	93,3			TEKSTİL KİMYASALLARI MSDS	prof. Dr. Faruk Bozdoğan	0 232 388 78 59
8	COSMING	80			KOZMETİK-Aerobik Mezofilik Bakteri Sayımı Küf ve Maya Sayımı	Aylin Kahrıman	0 232 431 11 21
9	EGE CHELAB		78,5		Pestisit	Yasemin Hançer	0232 328 28 44
10	BİLAÇON		95,5		Pestisit, Glyphosate,	Abgar Bansytan	(0236) 239 3594
11							
Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür							
Revizyon Nedeni 03 : Bilacon Eklendi							

	CONFIDENTIALITY & CONFLICTS OF INTEREST	DOC. NO	GP 08
		DATE	01.08.2016
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1. PURPOSE

This procedure describes the responsibilities and method to assure the confidentiality, and prevent the conflict of interest in operations. .

2. RESPONSIBILITIES

OM and management team are responsible for the proper implementation of this procedure.

3. RECORDS

GP 08 F 01 Confidentiality & Conflict of Interest Agreement

4. REFERENCES

GP 04 Subcontracting procedure

5. APPLICATION

5.1 Confidentiality

- A production or handling operation is not certified if ETKO or a responsibly connected party of ETKO has or has held a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 24-month period prior to the application for certification;
- Any employee, inspector, contractor, or other personnel is not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected;
- Providing advice or consultancy services, is strictly forbidden, to certification applicants or certified operations for overcoming identified barriers to certification;
- 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 ETKO shall sign the Confidentiality & Conflict of Interest Agreement (GP 08 F 01)

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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- ETKO management ensures 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 reconsiders a certified operation's application for certification and, if necessary, perform a new on-site inspection when it is determined, within 24 months of certifying the operation that any person, including contractors, participating in the certification process has or has had a conflict of interest involving the applicant.
- Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification.
- ETKO refers to a different accredited certifying agent for recertification and reimburse the operation for the cost of the recertification when it is determined that ETKO or a responsibly connected person had a conflict of interest involving the applicant at the time of application.
- ETKO consider itself having a conflict of interest if he/she holds or has held within 24 months prior to certification, a commercial interest (including immediate family interest) in the applicant's production or handling operation, or has provided consulting services to the applicant.
- ETKO refrains from making false or misleading claims about its accreditation status, about the accreditation programs of accreditation bodies for certifying agents, or the nature or qualities of products labeled as organically produced;
- ETKO furnishes reasonable security, in an amount and according to such terms as the law or applicable regulation requires, for the purpose of protecting the rights of production and handling operations certified by such certifying agent under the regulations.
- All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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- None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.
- All ETKO employees have to sign Col form for each year, including the committee members (ADC and APC), subcontracted inspectors, if any personnel of external bodies, or personnel acting on ETKO's behalf. For committee members Col arrangements, Quality Manual Section 3 applies also. These forms are kept by Quality and Office Manager in personnel files. 6.1.1.3
- ETKO shall not disclose any information or samples, materials, document to other parties without consent of the licensee unless it is enforced by the law of the land and accreditation bodies.
- **ETKO will** be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities. Except for information that the client makes publicly available, or when agreed between ETKO and the client (e.g. for the purpose of responding to complaints), all other information is considered proprietary information and shall be regarded as confidential. ETKO will inform the client, in advance, of the information it intends to place in the public domain. 4.5.1
- When ETKO is required by law or authorized by contractual arrangements to release confidential information, the client or person concerned shall, unless prohibited by law, be notified of the information provided. 4.5.2
- Information about the client obtained from sources other than the client (e.g. from the complainant or from regulators) will be treated as confidential. 4.5.3

5.2 Additional TE Requirement for Conflict of Interest

5.2.1 Conflict of Interest

In addition to 4.2: Conflict of Interest A conflict of interest is defined as an actual or perceived interest in an action that results in or has the appearance of resulting in personal, organizational, or professional gain. Rules and procedures shall be established to prevent or minimize threats of conflicts of interest. In particular:

- a) The Certification Body shall require personnel, committee and board members to declare existing or prior association with an operation subject to certification. Where such an

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QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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association threatens impartiality, the Certification Body shall exclude the person concerned from work, discussion and decisions at all stages of the certification process related to the potential conflict of interest.

- b) If a conflict of interest between certification personnel and an operation is found after assessment has occurred, another unbiased person must be assigned to assess if it has affected the certification process as well as complete the remainder of the process if possible.
- c) Personnel must not be allowed to assess their own work.

5.2.2 Division of functions

The Certification Body shall not provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions. In case the Certification Body also performs other activities in addition to certification, it shall apply additional measures to ensure that the confidentiality, objectivity and impartiality of its certifications are not affected by these other activities. In particular the Certification Body shall not:

- a) Produce or supply products of the type it certifies;
- b) Give advice or provide consultancy services to the applicant/operator as to methods of dealing with matters which are barriers (eg.: non-conformities identified in the course of the certification process) to the standard's certification. Explanations regarding the standard and its quality assurance system are not considered to be advice or consultancy. General information or training may be given as long as this service is offered to all applicants/operators in a non-discriminatory manner.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04 2016
		REV. NO	05
		SAYFA	1/2

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.201	Signature
Name		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
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(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?:

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ___ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest? Yes ___ No ___ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. [I guarantee do not dealing with marketing of ETKO certified products](#)

Date	02.01.201	Signature
Name		

(Please return the completed form)

STATEMENT OF IMPARTIALITY

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ETKO Management is committed to provide the reliable and highest quality customer service for organic certification according to most valuable programs and to give support to public health and safety that includes managerial compliance with ISO/IEC 17065 general requirements.

ETKO management provides all necessary resources and infrastructure to ensure that CERTIFICATES produced by ETKO comply with regulations and customer requirements.

ETKO maintain a quality program that is clear, effective, well communicated, and supported at all levels in ETKO and ensures the compliance with the requirements of science, objectivity, impartiality and confidentiality.

ETKO ensures that no conflicts of interest exist between ETKO staff and customers.

ETKO management and its staff members (including part-time members) shall only deal with or take part in the design, development, consultation or any trade transaction related to the customers' products, under agreements entered into by ETKO management.

ETKO Management makes a commitment that never becomes discriminatory in regard to the policies and procedures under which it operates and the administration of them which shall not be used to impede or inhibit access by applicants, other than as provided for in this Standard and, that doesn't implement any practice which leads to discrimination by taking into consideration the applicants' extent or having a membership to any association or group, or the number of the existing issued documentations.

GENERAL MANAGER

SIGNATURE

DATE

We, the undersigned Commissioners of ETKO, hereby guarantee the independence and the impartiality of ETKO

ETKO BOARD MEMBERS

TITLE	NAME	SIGNATURE	DATE
Managing Director	Mustafa Akyüz		04.05.2016
QMS Responsible	Asuman Erdem		04.05.2016
Office Manager	Fatih Aksoy		04.05.2016
Textile Department Resp	Mehmetali Kösem		04.05.2016
Accountant	Öznur Kılıç		

	RISK EVALUATION TABLE For ETKO SERVICES and IMPARTIALITY							Document No::	GP 08 F 03								
													Revision Date :	08.04.2016			
														Revision No:	00		
														Page No:	1/8		
DIVISON / PROCESS/SUBJECT	POTENTIAL RISK(S)	REASON OF RISK(s)	PROBABLE RESULT(S) OF RISK	P	S	R	PRECAUTIONARY MEASURES	RELATED DOCUMENT(S)	P	S	R						
1.1 SOURCE OF RISKS : PERSONNEL GENERAL	1.SOURCE OF RISKS : PERSONNEL																
	To give one of the operator preferential treatment	To have Family relations or friendship between personnel and operator	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	2	5	10	All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06-Personnel Agreement	1	5	5						
	Commercial relation between personnel and operator - last 24 months	To gain financial benefit	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	3	5	15	* All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST” *Confirmation of Operator that there is no conflict of interest with inspector.	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06- Personnel Agreement * OP 05 F 04- Inspection Detailed Plan	1	5	5						
	To get the documents and information of ETKO without permission	Relation with the other Certification Bodies	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	4	5	20	All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06- Personnel Agreement	1	5	5						
	To share the Operators’ information with third person	Relation with the other Certification Bodies	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements	4	5	20	All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST	1	5	5						
Prepared by QMS						Approved by General Manager											

	RISK EVALUATION TABLE For ETKO SERVICES and IMPARTIALITY							Document No::		GP 08 F 03	
								Revision Date :		08.04.2016	
								Revision No:		00	
								Page No:		2/8	
DIVISON / PROCESS/SUBJECT	POTENTIAL RISK(S)	REASON OF RISK(s)	PROBABLE RESULT(S) OF RISK	P	S	R	PRECAUTIONARY MEASURES	RELATED DOCUMENT(S)	P	S	R
			*Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators					* SP05 F06- Personnel Agreement			
	*Providing consultancy to operator. *Support to solve the operator’s problems	To gain financial benefit	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	3	5	15	All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST” *Wrong Confirmation of Operator that there is no conflict of interest with inspector.	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06- Personnel Agreement * OP 05 F 04- Inspection Detailed Plan	1	5	5
	To accept expensive gifts, secret commission etc.	To gain financial benefit	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	3	5	15	All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	*GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06- Personnel Agreement	1	5	5
1.2 SOURCE OF RISKS : PERSONNEL – ON-SITE INSPECTIONS	Operations /Inspection that is not met current Procedures/ Instructions	QMS Documents are not used under control	Usage of old version documents during inspection	3	4	12	*Distribution of documents (Hard copy and on electronic media) under control *Awareness training about the updated documents and process.	*SP 01-Document Control Procedure *Training Records	1	3	3
	Implementation errors during on-site inspection.	Personnel is not competent	Wrong inspection result	3	4	12	*Personnel Trainings *Effectiveness of training is monitored *Inspection Report is reviewed by Certifier	*Training Records * SP 05 F 01- Inspector Monitoring Form *OP 01 F 32-Certification Decision Form	1	3	3
Prepared by QMS							Approved by General Manager				

		RISK EVALUATION TABLE For ETKO SERVICES and IMPARTIALITY						Document No::		GP 08 F 03							
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								Page No:		3/8							
DIVISON / PROCESS/SUBJECT	POTENTIAL RISK(S)	REASON OF RISK(s)	PROBABLE RESULT(S) OF RISK	P	S	R	PRECAUTIONARY MEASURES	RELATED DOCUMENT(S)	P	S	R						
	Not collect the objective evidences during on-site inspection	*Inspector is not competent *Inspection is not effective because of time shortage *Inspector neglect his job.	*Inspection is not effective *Certification Decision could not been given *Certification Decision could be given with insufficient information **Unfair competition with the other operators *Major Nonconformity could be given to ETKO during Accreditation audits by Accreditation body.	4	4	16	*Personnel Trainings *Effectiveness of training is monitored *Inspections are planned in details. *Inspection Report is reviewed by Certifier	*Training Records * SP 05 F 01- Inspector Monitoring Form * OP 05 F 04- Inspection Detailed Plan *OP 01 F 32-Certification Decision Form	2	4	8						
	Inspection reports are not prepared on time	Neglecting the job	Because of late certification, loss of local market and export of operator.	4	5	20	ETKO rule for submitting the Certificate to operator within 30 days after closing the nonconformities	SP 0 F 02-ETKO Objectives Tracking Table	2	5	10						
	Not to give necessary information on reports or to give wrong information	*Inspector is not competent on-site inspections *Lack of experience *Acting favor of client	*Late Certification of operator. *Operator/Customer dissatisfaction *Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	3	5	15	*Personnel Trainings *Effectiveness of training is monitored *Inspectors are monitored periodically during on-site inspection *All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	*Training Records * SP 05 F 01- Inspector Monitoring Form **GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST * SP05 F06-Personnel Agreement	1	5	5						
Prepared by						Approved by											
QMS						General Manager											

	RISK EVALUATION TABLE For ETKO SERVICES and IMPARTIALITY							Document No::	GP 08 F 03		
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DIVISON / PROCESS/SUBJECT	POTENTIAL RISK(S)	REASON OF RISK(s)	PROBABLE RESULT(S) OF RISK	P	S	R	PRECAUTIONARY MEASURES	RELATED DOCUMENT(S)	P	S	R

2.MANAGERIAL RISKS

2.1 SOURCE OF RISKS : MANAGEMENT - GENERAL	Commercial relations with operator(s)	To gain financial benefit	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	2	5	10	* Management of ETKO sign" GP 08 F 04- STATEMENT OF IMPARTIALITY *All ETKO Personnel sign "AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST"	* GP 08 F 04-STATEMENT OF IMPARTIALITY *GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST *GP 08- Confidentiality & Conflict of Interest Procedure	1	5	5
	Operators impress on ETKO	Conflict of interest between the CB and operator	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	2	5	10	Signing Operator Contract before inspection.	Operator Contract	1	5	5
	To offer commission to external consultants	To gain market and increase in certified customer /operator	*Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body	2	5	10	* Management of ETKO sign" GP 08 F 04- STATEMENT OF IMPARTIALITY *All ETKO Personnel sign "AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST"	* GP 08 F 04-STATEMENT OF IMPARTIALITY *GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST *GP 08- Confidentiality & Conflict of Interest Procedure	1	5	5
	To be the designer, manufacturer, installer, distributor or maintainer of the certified product and	To gain financial benefit	*Impartiality could not been provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO	2	5	10	* Management of ETKO sign" GP 08 F 04- STATEMENT OF IMPARTIALITY *All ETKO Personnel sign "AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST"	* GP 08 F 04-STATEMENT OF IMPARTIALITY *GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST	1	5	5

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		or process.		Accreditation by accreditation body *Unfair competition between operators					*GP 08- Confidentiality & Conflict of Interest Procedure			
		To use ETKO Certified products commercially	To gain financial benefit	*Impartiality could not be provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	1	5	10	* Management of ETKO sign” GP 08 F 04- STATEMENT OF IMPARTIALITY *All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	* GP 08 F 04-STATEMENT OF IMPARTIALITY *GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST *Confidentiality & Conflict of Interest Procedure	1	5	5
2.2 SOURCE OF RISKS : MANAGEMENT - PERSONNEL POLICY		Lack of Personnel	*Seasonal increase of inspection requests by operators. * High Personnel Costs	*Late Certification of operator. *Operator/Customer dissatisfaction	2	4	8	* External inspectors are used in addition to ETKO Inspectors	*Personnel List *Personnel Competency Table	1	4	4
		Management of ETKO impress on personnel	Conflict of interest between CB and operator	*Impartiality could not be provided *Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body *Unfair competition between operators	2	5	10	* Management of ETKO sign” GP 08 F 04- STATEMENT OF IMPARTIALITY *All ETKO Personnel sign “AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST”	* GP 08 F 04-STATEMENT OF IMPARTIALITY *GP08 F01- AGREEMENT FOR CONFIDENTIALITY AND CONFLICT OF INTEREST *Confidentiality & Conflict of Interest Procedure	1	5	5
		3 consecutive inspection of the same operator by the same Inspector	*Lack of Personnel *Inspections are not planned effectively	* Impartiality could not be provided *Regulations and 17065 requirements are not met. *Major Nonconformity could	2	5	10	* External inspectors are used in addition to ETKO Inspectors * Inspection Plans are prepared systematically.	*Personnel List *Personnel Competency Table *OP05 F02 Planned Inspections	1	5	5
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			be given to ETKO during Accreditation audits by Accreditation body.								
2.3 SOURCE OF RISKS : MANAGEMENT - CERTIFICATION PROCESS	No response for Inspection requests of operators.	No planning of inspections	Operator could not get “Certificate” on time, so, loss of local market &export for operator	3	5	15	Inspection Plans are prepared in details.	* OP 05 F 04- Inspection Detailed Plan	1	5	5
	Delay of Operator Certificate	Inspection Report is not prepared on time	Operator could not get “Certificate” on time, so, loss of local market &export for operator	3	5	15	* ETKO rule for submitting the closing evidences of nonconformities to ETKO by operator within 30 days after notification of ETKO * ETKO rule for submitting the Certificate to operator within 30 days after closing the nonconformities	*OP 01 Certification Procedure * SP 0 F 02-ETKO Objectives Tracking Table	1	5	5
2.4 SOURCE OF RISKS : MANAGEMENT - LEGAL REGULATIONS	Not to obey legal regulations	Not tracking the up-to-datedness of legal regulations and certification programs	*Not to meet the legal regulations and requirements of certification programs *Wrong inspection results and invalid certificates	3	5	15	Up-to-datedness of Legal regulations and certification programs are tracked systematically	SP 01 F 05-Legal and Outsourced Documents Tracking List	1	5	5
2.5 SOURCE OF RISKS : MANAGEMENT - QMS	Different inspection applications and usage of different documents by inspectors.	QMS implementation is not effective in ETKO	*Not to meet the regulations and 17065 requirements *Suspension of ETKO Accreditation by accreditation body	3	5	15	*Forms are put on common file in ETKO intranet for usage of current documents by related personnel * Up-to-Datedness of ETKO documents are done systematically *On-site inspections are monitored systematically during internal audits	*SP01 Document Control Procedure *SP 02 Internal Audit Procedure *SP 02 F01 Internal Audit Plan	1	5	5
2.6 SOURCE OF RISKS : MANAGEMENT - SUPPLYING LABORATORY TEST SERVICES	Pesticide residue is not detected in non-organic crop	*Wrong test result by lab. * Limit of detection (LOD) of laboratory equipment is not satisfactory	*Non organic products are sold with organic product label *.Consumer is deceived	2	5	10	Accredited Laboratories are approved and subcontracted	Laboratory Accreditation Scope	1	5	5

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	Pesticide residue is detected in organic crop	*Wrong test result by laboratory.	Operator could not get “Organic Certificate”, so, loss of local market & export	2	5	10	Accredited Laboratories are approved and subcontracted	Laboratory Accreditation Scope	1	5	5
	Too much samples are sent to lab.	*High-test Costs * Takes time for waiting test results from the lab.	Operator/Customer dissatisfaction	3	4	12	Number of samples are decided according to risk analysis of operator	“Risk Analyses & Inspection visits” Instructions	1	4	4
	Subcontracting with Non competent Laboratories	*Approval of Labs. by ETKO Without investigation of Lab. Facilities *Inspector has no knowledge about Lab. competency *Conflict of interest between the lab. and inspector or operator	*Non reliable test results * Operator/Customer dissatisfaction * Impartiality could not been provided	3	5	15	*Accredited Laboratories are approved and subcontracted * Systematic Laboratory Performance Evaluation by ETKO’nun *Approved Laboratories are shared on ETKO Web site *Agreements are signed between Laboratory and ETKO	*GP06 F04- Laboratory Performance Evaluation Form * GP 06 F 02 –Approved Laboratories List *ETKO web Site * GP 06 F 01-Laboratory Agreement	1	5	5
2.7 SOURCE OF RISKS : MANAGEMENT - IT	Could not retrieval of records and reports	Network break down	Missing of Operator information, Control Reports, etc.	3	5	15	*Providing IT Security *Systematic Back-Up *Protecting the hard copies of records and Inspection Reports	*Records Control Procedure *Operator inspection Files	2	4	8

Abbreviations:

R: Risk P: Probability S: Severity)

R= P X S

Scoring Criteria is given below: If Risk Score > 10, then, a preventive action should be done.

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RISK MATRIX:

PROBABILITY	PROBABILITY GRADING STEPS	SCORE		SEVERITY	SEVERITY GRADING STEPS	SCORE
TOO LOW	ONCE IN 2 YEARS	1		NEGLIGIBLE	*No loss of business, *No effect on accreditation process	1
LOW	ONCE IN A YEAR	2		SLIGHT	*Slight loss of business, *Accreditation process could be effected slightly	2
MEDIUM	ONCE IN 6 MONTHS PERIOD	3		MEDIUM	*There is some loss of business, *Minor nonconformity could be given by accreditation body	3
HIGH	ONCE IN A MONTH	4		SERIOUS	* Serious loss of business, *Major nonconformity could be given by accreditation body	4
TOO HIGH	ONCE IN A WEEK	5		TOO SERIOUS	*Business loss is too serous, *Suspension of accreditation by accreditation body	5

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	LABELING USE OF LOGO, LICENCES, CONFORMITY MARKS	DOC. NR	GP 11
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1. PURPOSE

ETKO exercises proper control over ownership, use and display of licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is certified according to this procedure. 4.1.3.1

2. RESPONSIBILITIES

Inspection division is responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

GP 18 NOP Certification Procedures
GP 23 Private Standards Certification

5. APPLICATION

5.1. Use of the ETKO Logo

ETKO has established its own logo.

- ETKO licensees (including importers) can use ETKO Logo for all the organic programs that ETKO offers
- Clients are not required to use ETKO logo on any product sold, labeled, or represented as organically produced as a condition of certification; and
- Clients are not required to comply with any production or handling practices other than those stated in the regulations in order to use ETKO's identifying mark.

ETKO's logo represents the integrity of its certified organic products. The use of this logo on ETKO certified organic products, in the form of a label mark, is an option that is available to interested certified parties upon the execution of a separate agreement.

After the certification decision has been taken by ETKO, ETKO will inform its operator that he can use the labels on his organic product(s).

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This label mark has been designed for the specific purpose of providing promotional identification of ETKO certified products. Products with a mark of ETKO show that the product so labeled has been certified organic to the uniformly high standards.

ETKO Logo may be used by the clients (operators including importers) with the permission of ETKO, for general labeling requirements which are applicable for raw, processed or finished products, in different sizes unless the proportion does not change.

1. ETKO Logo may be used on the packages and over products
2. ETKO Logo may be used compliance certificates

In the following cases ETKO logo cannot be used:

1. For the activities and addresses which are not in the certification program.
2. Infringement
3. For promotional tools such as pen, notebook, lighter etc

According to NOP Exception: ETKO certified production or handling operations within a State with more restrictive requirements, approved by NOP, shall require compliance with such requirements as a condition of use of its identifying mark by such operations. ETKO will accept only raw material or ingredients from other NOP accredited certifiers but will not allow these operators to use the ETKO mark, unless their products go through the ETKO application and review process.

5.1.1 Use of mark by non-certified brand owner (According to COR)

When under its own brand a company distributes products provided by a supplier to whom certification is granted by ETKO, this means that the company uses ETKO's mark to market these products. Thus even though the company itself possesses no certificate for its private brand products, ETKO shall require that the company:

- a) inscribe on the packaging of products being resold under a private brand, a reference to the certified product supplier, indicated such that the supplier may be identified by both the competent authority and ETKO concerned;
- b) maintain a registry of all certified products received from the supplier, distributed, and eventually sold under either one or more previously approved labels;

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c) accept that ETKO whose name is indicated on product labels be allowed to inspect these records when required and that records kept allow product movement to be traced, from the entry point (reports concerning products obtained from suppliers) up until a product leaves the premises (product sales reports and inventory reports).

5.1.2 Use of mark by sub licensee (According to COR)

Company producing a product exclusively for a company that holds the certificate in order to market it:

When a company does not hold a certificate but has an exclusive affiliation with the operator it supplies, and the operator holds the compliance certificate for the products being supplied, then the compliance mark will only be used on labels of those products it packages, in an exclusive manner for the supplier and on a site falling under its responsibility.

A company will inform officially ETKO about the identity of any other company for which it intends to manufacture products under license, and thus as a result can use the ETKO's mark (name and logo) on the label of the products that it intends to market under its own brand name even though it does not hold a compliance certificate for those products.

5.2 Labeling Requirements

Clients must meet the following criteria:

- The percentage statement of organic ingredients on the product package appears in letters that do not exceed one-half the size of the largest type on the panel on which the statement is displayed, and appears in its entirety in the same type size, style, and color without highlighting;
- Clients who produce the finished product maintain records verifying the organic certification of the operations of organic raw materials or organic ingredients; and
- Clients do not individually display ETKO seal or mark more prominently than the official seals such as USDA, COR.

According to COR: A company producing and marketing an ETKO certified product in addition to supplying to another company that holds a certificate in order to market it as well:

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When in a nonexclusive manner a company supplies a client that has obtained a certificate from a certifier for products being marketed under a private brand, and this company already holds for its products a certificate granted by another certifying body, ETKO's mark will only be used on labels placed on products prepared and packaged for this client, on a site falling under the company's responsibility, and as a result of an extension to the license granted to this client by ETKO.

According to NOP:

Labeling category for each product certified under the handling/processing certification category (not required for products in the crops, wild crops, or livestock certification categories). Labeling categories: 100% Organic, Organic, Made with Organic (specified ingredients or food groups), and Livestock Feed (Organic or 100% Organic);

Clients (operators including importers) who produce or handle products labeled "organic" shall denote each organic ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced.

Client (operators including importers) must have indicate, below the information identifying the handler or distributor of the product and proceeded by the statement, "Certified organic by ETKO ..," or a similar phrase, the name of the certifying agent that certified the handler of the finished product is identified.

Clients (operators including importers) may use the following terms;

- The term, "100 percent organic" or "organic," as applicable, as the name of the product is identified.
- For products labeled "organic," the percentage of organic ingredients in the product.
- The term, "organic," to identify the organic ingredients in multi-ingredient products labeled "100 percent organic."
- The USDA seal.
- The ETKO logo and identification of any other certifying agent which certified production or handling operations of raw organic product or organic ingredients used in the finished product.

The packages labeled "made with organic (specified ingredients or food group(s))" shall not display the USDA seal.

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Some activities undertaken by applicants in regard to this section are permissive. Agricultural products in packages labeled “made with organic (specified ingredients or food group(s))” may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product, the following information, providing all other conditions are met: (For NOP §205.304)

- A statement, “made with organic (specified ingredients).”
- A statement, “made with organic (specified food groups).”
- The seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.

5.3. Multi ingredient packaged products with less than %70 organically produced ingredients

When an agricultural product contains less than 70 percent organically produced ingredients; the client will do the followings:

- Each organically produced ingredient in the ingredient statement will be explained with the word, “organic,” or an asterisk or other reference mark will be used meaning of which is explained below the ingredient statement to indicate the ingredient is organically produced.
- The product’s percentage of organic contents on the information panel will be identified when the organically produced ingredients are identified in the ingredient statement.
- USDA seal or ETKO seal, logo, or other identifying mark which represents organic certification of a product or product ingredients must NOT be applied.

5.4. Agricultural products produced on exempt or excluded operations: (According to NOP)

Exempt and excluded operations that an agricultural product organically produced or handled on such operations **must not**:

- Display the USDA seal or ETKO seal or other identifying mark which represents the exempt or excluded operation as a certified organic operation; or
- Be represented as a certified organic product or certified organic ingredient to any buyer.

An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient only in a multi

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ingredient product produced by the exempt or excluded operation; it cannot be identified as organic for the other operations.

Exempt and excluded operations that an agricultural product or ingredient organically produced or handled on such operations **must not** be identified or represented as "organic" in a product processed by others.

Such product is subject to requirements specified in §205.300(a) [use of the term "organic"] and §205.301(f) (1) through (7) [allowed and prohibited materials and practices].

Any production or handling operation that sells agricultural products as organic whose gross income from such sales is less than the limits defined in legal documents is exempt from certification. These operations, however, must still comply with the applicable production and handling requirements

Upon the application review of such operations if it is determined that the monetary and handling requirements for exemption are provided, the applicant will be formally notified immediately of its exempt status. This notification will also include the requirements for compliance of the operation as noted in the above paragraph.

Excluded operations are those operations who only sell organic products which are received in their final packaged state and remain so without being further processed, retail food establishments that process, on the premises, raw and ready to eat food previously labeled as 100% organic, "organic", or "made with organic (specified ingredients or food groups).

5.5. Misuse of logo and marks, false claims

Incorrect references to the certification scheme or misleading use of licenses, certificates, marks, or any other mechanism for indicating a product is certified, found in documentation or other publicity shall be dealt with by suitable action as follows. 4.1.3.2

Misuse of logo, false claims and false use of the mark, incorrect references to the certification system or misleading use of licenses, certificates or marks (GOTS, COR, EU...) found in advertisements, catalogues etc will result in a major Non-Conformance. In such a case the client shall be formally requested to take urgent corrective action to eliminate the nonconformity and otherwise ETKO shall proceed for the withdrawal of certification, publication of transgression and, if necessary, other legal action.

In case ETKO certification and / or mark of conformity is used in anyway by third party, a formal notification shall be sent immediately to such user and legal action shall be taken accordingly

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Where ETKO has a substantiated suspicion that an operator intends to place on the market a product not in compliance with the organic production rules but bearing a reference to the organic production method, ETKO sends a notification to the operator requiring that the operator may provisionally not market the product with this reference for a time period to be set by ETKO. Before taking such a decision, the operator is allowed to comment on the subject. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if ETKO is sure that the product does not fulfil the requirements of organic production.

5.6. USDA seal

Clients may use the USDA seal only for raw or processed agricultural products meeting the requirements for "100 percent organic" or "organic," as described in the labeling regulations.

Client shall replicate the form and design of the USDA seal according to the following requirements:

- On a white background with a brown outer circle and with the term, "USDA," in green overlaying a white upper semicircle and with the term, "organic," in white overlaying the green lower half circle; or
- On a white or transparent background with black outer circle and black "USDA" on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.
- The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.

5.7 Labeling requirements according to TC Regulation 27676/2010 (Article 29)

- Organic final packed products imported or not produced according to this regulation cannot be labeled with TC LOGO.
- Raw material imported and re-processed and packed in Turkey can be labeled with TC LOGO as long as the raw product is certified in the country of production according to organic production regulation. In such cases country of production must be mentioned.
- Labeling of organic products according to TC Regulation requires following:
 - Name of the producer/processor
 - Reference to TC regulation and TC Logo
 - Name of the certifier code nr and its logo

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- Certificate nr
- Reference to organic, biological (bio), ecological (eco)
- Labeling of in conversion organic products according to TC Regulation requires following:
 - Products produced and completed minimum 12 months of conversion period according to TC regulation can be labeled as in conversion to organic farming
 - No TC logo can be used for IC products labels
 - Name of the producer/processor
 - Name of the certifier code nr and its logo
 - Certificate nr

5.8 Labeling requirements according to IACB “Equivalent European Organic Production and Processing Standard for Third Countries” (Article 9)

In the labeling and advertising of live or unprocessed agricultural products, terms referring to the organic production method may be used only where, in addition, all the ingredients of that product have also been produced in accordance with the requirements laid down in **IACB** Standard.

No products contains or produced from GMOs can be labeled according to **IACB** Standard.

The processed food can be labeled according to this Standard;

- complies with **IACB** Standard,
- at least 95 % by weight, of its ingredients of agricultural origin are organic;
- only in the list of ingredients, provided that the food complies with Article 7.4 of

IACB;

The list of ingredients shall indicate which ingredients are organic.

Compulsory indications:

Code nr of control body

Community logo

Raw material country of production. In this case following forms of indication as appropriate shall appear in the same visual field as the logo:

"EU Agriculture", where the agricultural raw material has been farmed in the EU;

"non-EU Agriculture", where the agricultural raw material has been farmed in third countries;

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"EU/non-EU Agriculture", where part of the agricultural raw materials has been farmed in the Community and a part of it has been farmed in a third country.

The abovementioned indication "EU" or "non-EU" may be replaced or supplemented by a country in the case where all agricultural raw materials of which the product is composed have been farmed in that country.

For the abovementioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin.

The abovementioned "EU" or "non-EU" indication shall not appear in a color, size and style of lettering more prominent than the sales description of the product.

The indications referred to in paragraph above shall be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.

Organic production logos:

Community Organic production logo may be used in the labeling, presentation and advertising of products which satisfy the requirements set out under **IACB** Standard. The Community logo shall not be used in the case of in conversion products and food. In-conversion products of plant origin may bear the indication 'product under conversion to organic farming' provided that:

- (a) a conversion period of at least 12 months before the harvest has been complied with;
- (b) the indication shall appear in a color, size and style of lettering which is not more prominent than the sales description of the product, the entire indication shall have the same size of letters;
- (c) the product contains only one crop ingredient of agricultural origin;
- (d) the indication is linked to the code number of the control body

5.9 Private Standard Certification Schemes Logo Use

Private standards such as GOTS, TE, COSMOS or other similar ones apply to use their own logo as following the rules described by each different standard. GOTS described the logo use in its Labeling Guide. TE described as well how to use TE logos in its Standards. COSMOS Labeling and logo use is described in Cosmos Standard Labeling Guide.

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Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3, CAN/CGSB-32.310-2015. Section 8	Doc Nr	GP 18 F 01
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			Inspector Comments	
Processor Comments				

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

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

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

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

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

Related to transport and storage activities.

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

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

NAME LICENSEE				
NAME PROCESSOR				
PROCESSING SITE ADDRESS				
COUNTRY				
PHONE-FAX-EMAIL				
ACTIVITIES				
CONTACT PERSON				
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC	<input type="checkbox"/> Other

1.PRODUCTS TO BE CERTIFIED

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

Incase needed make a separate list.

		General Principles	COMMENT	COMMENT
A1	205.201	Organic Compliance Plan Overview– If the information requested is available in other company documents, please provide a clear reference to the exact section of your appropriate record.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A1.1	205.201(a)(6)	Facility Map: A complete facility plan is present and includes major equipment, rooms and building? PLEASE ATTACH FACILITY MAP		
A1.2	205.201(a)(1) IACB 5.3	Production process diagram is present for each product (You need to provide a flow chart showing how the product moves in your plant including major equipment)? PLEASE ATTACH PROCESS DIAGRAM FOR EACH PRODUCT		

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A1.3	IACB 5.3	A brief description of each process must be given? PLEASE ATTACH THE DOCUMENTS (PROCEDURES) SHOWING FULL DESCRIPTION OF THE PROCESS OF: LABELLING, PACKAGING, STORING, TRANSPORTATION PROCESS AND OTHER PROCESS IN THE FACILITY.			
A1.4	205.201 (a)(1)	A brief description of production practices and procedures including the estimated frequency and volume of these production runs are present? PLEASE EXPLAIN BRIEFLY PRODUCTION PRACTICES, FREQUENCY AND VOLUME			
A1.5	205.201 (a)(2)	Accurate Product Specifications were prepared and present for all complex products seeking certification? PLEASE ATTACH PRODUCT SPECIFICATIONS			
A1.6	205.201 (a)(3) 889-Article 63 IACB 5.3	A brief description of your quality monitoring practices is prepared? PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED			
A1.7	205.201 (a)(4) 889-Article 66 IACB 10.1	Do you have available for review by the inspector, an audit trail of documents that tracks product by identity and volume from receiving through distribution? PLEASE LIST WHICH DOCUMENTS YOU KEEP FOR AUDIT TRAIL			
A1.8	205.201 (a)(5) 889-Article 26 IACB 7.2	A brief description of your management practices used to protect the organic commodities from potential co-mingling and contamination is present? PLEASE EXPLAIN HERE HOW DO YOU AVOID CO-MINGLING AND CONTAMINATION			
A1.9	889/08 Article 31.1 IACB 7.5.2	The operator shall check the closing of the packaging or container where it is required and the presence of the indications. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts. PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS OF THE ORGANIC PRODUCT			
A2		Product Protection – Please maintain, and make available, Product Protection Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A2.1	205.301 (f)(7)	Do you use exclusively <u>either</u> an organic or conventional form of any ingredient in each formula (e.g. organic raisins or conventional raisins, not both, in organic cake)? PLEASE EXPLAIN YOUR PRODUCT COMPOSITION			
A2.2	205.272(a) 889-Article 26 IACB 7.2	Do you take adequate measures to prevent, during all stages of production and storage? Commingling of organic and non-organic product and ingredients; and PLEASE EXPLAIN HERE HOW DO YOU AVOID			
A2.3	205.272(a) 889-Article 26 IACB 7.2	Contact of organic products and ingredients by prohibited substances or sanitation materials? PLEASE EXPLAIN HOW DO YOU AVOID			
A2.4	205.272(a) 889-Article 31 IACB 7.5.2	Are procedures and documentation used to protect the organic integrity of products under your control			

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		during transport? PLEASE EXPLAIN HOW DO YOU PROTECT ORGANIC INTEGRITY DURING TRANSPORT			
A3	205.201(a) 205.271 889-Article 63 IACB 5.3	Facility Pest Management – Please maintain, and make available, copies of your Facility Pest Management Program for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A3.1	205.271(a)(b)	Is a structural pest management program in place that stresses sanitation and other preventive measures including mechanical traps, lures and repellants consistent with the National List? PLEASE EXPLAIN HERE YOUR PEST MANAGEMENT METHOD			
A3.2	205.271(c)	Are substances used inside the facility for pest control: On the National List? and PLEASE LIST HERE SUBSTANCES USED INSIDE THE FACILITY			
A3.3	205.271(c)	Used only when preventive and control measures are not effective? PLEASE EXPLAIN THE REASON OF USE			
A3.4	205.271(d)(e)	If inside facility pest control materials are used that do not appear on the National List: are they used only when prevention control measures and materials on the National List are not effective and PLEASE LIST MATERIALS USED AND NOT ON THE NATIONAL LIST			
A3.5	205.271(d)(e)	are measures taken to prevent contact of the organic products with the substance used? PLEASE EXPLAIN HOW TO PREVENT CONTACT TO ORGANIC PRODUCTS			
A3.6	205.271(f)	Are you aware that you are responsible for using materials in compliance with all local, state and federal regulations? PLEASE EXPLAIN WHEN THERE IS ANY METHOD AGAINST THE ORGANIC REGULATION			
A3.7	205.201(a), 205.271	Does your pest management program include facility maps, incident logs and pesticide use charts? PLEASE EXPLAIN			
A4	889-A834-Art.10, 26, 35 IACB 7.2, 7.5.4	Sanitation – Please maintain, and make available, Sanitation Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A4.1	205.201(a)(5), 205.272(a)	Does this facility have a formalized sanitation program to protect the organic integrity of organic raw materials and finished goods during storage? PLEASE EXPLAIN			
A4.2	205.272(a)(2)	Is there a sanitation program to prevent contamination on food contact surfaces from cleansers and sanitizers? PLEASE EXPLAIN SANITATION METHOD			
A4.3	205.272(b)(2)	If packaging materials or containers are re-used, are proper cleaning procedures maintained prior to organic use? PLEASE EXPLAIN CLEANING METHOD			
A4.4	205.272(b)(1)	Are all packaging materials, and containers free of prohibited synthetic fungicides, preservatives, fumigants and other contaminants? PLEASE INDICATE HOW DO YOU SECURE THAT			
A4.5	889-Article-35.4c	Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products? Are these operations recorded? EXPLAIN WHICH CLEANING MEASURES YOU TAKE			

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and HOW IT IS CHECKED AND RECORDED					
A5	889-Article 63 IACB 5.3	Quality Assurance-Please maintain, and make available, Quality Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A5.1	205.201(a)(1-6)	Does your quality management system adequately document and provide verification of its compliance with the organic regulations? PLEASE LIST DOCUMENTS RELATED TO QUALITY MANAGEMENT			
A5.2	205.103(b)(4), 205.201(a)(1-6)	Is there a management system in place that covers all aspects of products (TQM, HACCP, ISO, etc.)? PLEASE INDICATE WHICH QUALITY SYSTEM CERTIFICATION PRESENT			
A5.3	205.103(b)(4), 205.201(a)(1-6)	Do you have a procedure for documenting and addressing complaints relating to compliance with organic standards? PLEASE INDICATE THE NAME OF THE PROCEDURE AND DOCUMENTS			
A6	889-Article 66 IACB 10.1	Record Keeping (Audit Trail) – Please maintain, and make available all record keeping for each onsite inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A6.1	205.201 (a)(1-2), 205.103(a)	Are current organic certificates for all contracted handling operations maintained? PLEASE EXPLAIN IF ALL SUBCONTRACTED UNITS HAVE ORGANIC CERTIFICATION			
A6.2	205.103(b)(4)	Is there a formal Audit Trail in place with sufficient records to show the following: a) Raw commodity receiving, b) Lot tracking & coding, c) Certification of organic materials, d) Purchasing receipts, e) Production records, f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM			
A6.3	205.103(b)(3)	Do you maintain all records for at least five (5) years?			
A6.4		Every producer, processor or operator in the organic project who sells their organic product to the final consumer will be responsible to hold an account on daily basis on the quantity that is sold. Daily account records?			
A7	834-Article 19, 23 IACB 7.4, 9.1	Product composition and labelling categories		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A7.1		For complex products product specifications were prepared and send to ETKO for approval? PLEASE ATTACH PRODUCTS SPECIFICATIONS			
A7.2	205.105	100% organic products contains only organic ingredients except water and salt? Products are labelled "100% Organic product" PLEASE LIST 100% ORGANIC PRODUCTS			
A7.3		95% organic products contains minimum 95% certified organic materials and the rest 5% material complies the organic regulations lists? Products are labelled as "organic" product. PLEASE LIST 95% ORGANIC PRODUCTS			
A7.4	205.302	All ingredients were evaluated as how many % of organic content they have. So the percentages were calculated correct. Example: 99.5% organic sultanas + 95% organic flour+100% organic sugar+1% not			

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		certified but allowed vanilla flavour= how many percent it makes the composition? PLEASE LIST HERE OR A SEPARATE SHEET THE INGREDIENTS WITH PERCENTAGES			
A7.5		70% organic products contains minimum 70% organic certified ingredients and labelled as "Made with organic-----" PLEASE LIST IF YOU HAVE 70% ORGANIC PRODUCTS			
A7.6		Traceability of the multi ingredient products are set and kept in good order for inspections. PLEASE LIST MULTI INGREDIENT PRODUCTS			
A7.8		In case use of conventional agriculture ingredients, you have enough evidence indicating non availability of related ingredients. , PLEASE LIST CONVENTIONAL INGREDIENTS USED IF ANY AND ATTACH NON-AVAILABILITY DECLARATIONS			
A7.9		All non agricultural ingredients & processing aids are included in organic regulation PLEASE LIST AGRICULTURAL INGREDIENTS AND PROCESSING AIDS			
A7.10	205.605	If there is any specific situation maybe unique to your operation and you are planning to use a synthetic material, processing aid or ingredient, you always refer to regulations list? PLEASE LIST PROCESSING AIDS, MATERIAL OR INGREDIENT USED			
A8	834-Article 19, 23 IACB 7.4, 9.1	Labelling		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A8.1	205.307	When there is no labeling for bulk products do you identify organic products in the form of a lot number or other tracking device? PLEASE EXPLAIN INDICATION STATUS OF ORGANIC			
A8.2	205.307	There is always label attached to raw material and is it visible? PLEASE EXPLAIN HOW DO YOU INDICATE			
A8.3	205.307	There is always label attached to final packed product? PLEASE ATTACH THE LABELS USED or INDICATE THE LABEL CONTENT HERE			
A9.4	205.307	Labels for raw material and final product complies the organic regulations and approved by ETKO before use? PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE			
A9.5	205.300-311	Labeling categories comply the organic regulation requirements and approved by ETKO? PLEASE INDICATE WHICH CATEGORIES YOU APPLIED FOR			
A10		Packing Material		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A10.1	205.272b	Packing materials were evaluated against chemical contamination and there is no chemical pesticides or heavy metal applications to packing material? PLEASE EXPLAIN YOUR PROCEDURE TO EVALUATE PACKING MATERIAL			
A10.2		Packing material was stored in a way that no pest-rodent can nest and reproduce, no physical pollutants are present? PLEASE EXPLAIN HOW YOU STORE PACKING MATERIAL			
A11		Recertification		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	

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A11.1		If you are intend to buy and export products from other certified sources by other certifiers, did you get inspection report and master certificate of the supplier? PLEASE ATTACH CERTIFICATION DOCUMENTS OF THE SUPPLIER			
A11.2		The certifier of the supplier is accredited (USDA, ISO 65, EN 45011)? PLEASE ATTACH THE CERTIFIERS ACCREDITATION LETTER			
A11.3		Analyses report of the product is present? PLEASE ATTACH THE ANALYSES RESULTS OF THE ORGANIC PRODUCTS YOU BUY			
A12	889-Articles 27 and 27a; IACB 7.4.1	Water use		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A12.1		There are water analyses results if water is used for any steps of the processing and has contact to the product? PLEASE ATTACH WATER ANALYSES RESULT			
A12.2		Only drinkable water is used as ingredient of the final product? PLEASE EXPLAIN THE SOURCE OF THE WATER			
A12.3		Chlor content of the water cannot exceed according to consumers country; eg NOP 4 ppm, Germany 0.3 ppm, does it comply? PLEASE ATTACH ANALYSES REPORT			
A12.4		Only drinkable water is used for washing products? PLEASE EXPLAIN THE SOURCE OF WATER			
A12.5		Boiler additives used are listed on the national list? PLEASE LIST IF ANY BOILER ADDITIVES USED			
A13		Complaints and Non conformities		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A13.1		Incase there is a residue problem and complaint from a buyer, do processor informs ETKO immediately? PLEASE INDICATE THE COMPLAINTS YOU RECEIVED			
A13.2		Incase analyses results show that there is a residue of an organic product then an evaluation report is prepared by the project responsible to identify the causes and send to ETKO when finalized? PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES			
A13.3		When there is a contamination / commingling during the product flow in the processing facility or transport immediate corrective actions are taken and contaminated lot is isolated and disqualified by the responsible. Operator informs ETKO for the incidence and keeps the records? PLEASE EXPLAIN WHAT HAPPENED			
B1	889-Article 29, 30, 33 IACB 7.5.1, 7.5.2, 7.5.3	Goods reception		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B1.1		Raw material and food ingredients were transported in a manner that integrity of organic product was not affected? PLEASE EXPLAIN TRANSPORT SYTEM			
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? PLEASE EXPLAIN RECORDING SYSTEM			
B1.3		In case there is a suspicion products are refused and not accepted for processing? PLEASE EXPLAIN REFUSAL SYSTEM			

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3, CAN/CGSB-32.310-2015. Section 8	Processor Comments	Doc Nr	GP 18 F 01
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B1.4		Following product flow within the processing unit is completely separated and precautionary measures are taken against contamination? PLEASE EXPLAIN SEPARATION SYSTEM			
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? PLEASE EXPLAIN HOW DO YOU RECORD			
B1.6	834-Article 23 IACB 9.1	Labels are attached to the incoming goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN INDICATION SYSTEM			
B1.7	889-Article 66 IACB 10.1	Traceability of incoming products are possible and kept in good order for inspections? PLEASE EXPLAIN TREACEABILITY SYTEM			
B2	889-Article 35 IACB 7.5.4	Storage		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B2.1		Stores are clean and there is no pollutants present which may damage the organic quality? PLEASE EXPLAIN HOW DO YOU KEEP STORES CLEAN			
B2.2		Stores where organic products are stored clearly indicated and visible? PLEASE EXPLAIN			
B2.3		Stock inventory is kept always updated, ready for inspections anytime? PLEASE EXPLAIN			
B2.4		Do you keep records for incoming-outgoing raw and processed products in auditable format? PLEASE EXPLAIN			
B2.5		Labels are attached to the stored goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN THE LABEL USED			
B3	834-Article 6 IACB 4.3, 4.4	Processing line		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B3.1	205.271	Processing line is regularly cleaned with materials allowed by the organic regulations. Specifications of the cleaning and disinfection materials are present for inspection? PLEASE LIST DISINFECTION MATERIALS			
B3.2		Only allowed methods and materials were used during the processing, they comply the organic regulations? PLEASE LIST ALL MATERIAL USED			
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? PLEASE EXPLAIN			
B3.4		Records related to processing times, quantities of raw and finished material are kept for organic products processing for inspections? PLEASE EXPLAIN			
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? PLEASE EXPLAIN YOUR PROCEDURES			
B4	205.105(e)	Excluded Methods		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B4.1	834-Article 9 889-Article 69 IACB 5.9	GMO Free declarations are present for the processing aids if applicable? PLEASE ATTACH DECLARATIONS			
B4.2	834-Article 10 IACB 5.10	There is no ionizing radiation and sewage sludge use neither for any processing nor any raw material used for the composition of the product?			

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		PLEASE EXPLAIN		
B5	NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3	Separation in Split Operations		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
B5.1		A procedure was developed and provided to each subcontracted processor for a good separation of organic products processing? PLEASE ATTACH PROCEDURE		
B5.2		Separation of organic raw material during receive is possible by documents, indication of status is present? PLEASE EXPLAIN YOUR SYSTEM		
B5.3		Separation of organic products in store is present and visible. There is no contact to any conventional product or non-allowed material? PLEASE EXPLAIN		
B5.4	205.605	Processing lines were completely cleaned with allowed substances and methods before organic processing? PLEASE LIST CLEANING MATERIAL		
B5.5		Workers who are in charge were trained to handle organic products to avoid contamination and commingling? PLEASE EXPLAIN TRAINING		
B5.6		Organic products certified according to different regulations were separately handled, labelled and stored? PLEASE EXPLAIN SEPARATION		
B5.7		Do you secure organic integrity in a continuous process such as milling, oil or sugar production by giving away certain quantity of organic product for depuration? Do you have a procedure to guarantee separation? PLEASE EXPLAIN HOW DO YOU MAKE IT		
C	205.103(b)(2)(4)	DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER		
		Following documents are part of your Organic Compliance Plan and always must be ready for inspection and must be submitted when it is required by ETKO or state officials. These documents must be kept at least 5 years as auditable.		
		Organic Compliance Plan is always present and updated regularly by the responsible		
		Production Process Diagram: (For each final product a separate one) is present		
		Samples of all labels to be used on products are present and approved by ETKO		
		Receiving records are present and complete		
		Stock inventory records are present and complete		
		Production records are present and complete		
		Distribution records are present and complete		
		Product and water analyses reports are present when applicable.		
		Product specifications for complex products means more than one ingredient are present		
		Processor agreements for subcontracted units are present		
		GMO Free Declarations for ingredients when applicable are present		
		List of processing aids and raw materials is prepared		

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		and present			
		Cleaning and disinfection material list and specifications are present for all units			
		Pest-rodent control records are present for all units			
		If the supplier is different incoming raw material certificates are present			
		If the supplier is different inspection report and master certificate of the supplier are present.			
		Organic production regulations are present			
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents			
		Complaint procedure is present and includes handling of complaints			
		Sanctions applied to products, subcontracted producers or processors are listed and ETKO is informed on time			
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.			
		Contracted producers agreements, field maps are present and complete			
		If applicable; Internal Control System procedures, farmers' inspection and training records are present. Valid only for EC 834/2007, NOP Regulation and BIOSUISSE, not recognized by TC 25841/2005			
D	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations			

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3, CAN/CGSB-32.310-2015 . Section 8		Doc Nr	GP 18 F 01
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SECTION E CONFIRMATION

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

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

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

Place, date:

Signature of the representative:

Name of the representative:

ETKO Results of Verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION		

Place, Date:

Name ETKO Representative

Signature of ETKO representative

Ref Nr	Reg. Nr	Organic Compliance Plan-Farming NOP 205.201, IACB 5.3, CAN/CGSB.4	Producer Comments		Doc Nr	GP 18 F 02
					Date	18.08.2016
					Rev No	06
					Page	1/12
					Inspector Comments	

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

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

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

If you have more than one processing facility, you can combine information related to all subcontracted processing units in one form. You do need to develop one OCP form for each processing unit to reduce paper usage.

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

This form must be filled in for each farm in the case big individual farms are present. In case there is grower group organization only one form could be prepared for the specific group managed by ICS.

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

NAME LICENSEE				
NAME FARM				
FARM ADDRESS				
COUNTRY				
PHONE-FAX-EMAIL				
ACTIVITIES				
CONTACT PERSON				
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC	<input type="checkbox"/> Other

1		GENERAL PRINCIPLES	COMMENT	COMMENT
				Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
1.1		You have never been denied organic certification? If no, explain; year, certifier, reason etc. IF YOU LOST ORGANIC CERTIFICATION BEFORE PLEASE EXPLAIN THE REASON		
1.2	205.400(d)	You permit on-site inspections with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices by the certifying agent.		
1.3	COR 4.3	General description of the type of farm operation: Orchards, Vegetables, Arable crops, Green house etc.		Annex Farm Production Report, "Farm Plot Inventory"
2	889-Article 40 205.201(a)(5) 205.272 IACB 6.3.1 COR 5.1.5	PARALLEL PRODUCTION and SPLIT OPERATIONS 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	Requirement of IACB is Parallel production of annual crops not allowed.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
2.1		Do you cultivate crops also conventional and organic quality? When yes, which crops? Crops: If yes, please check below mentioned information for your operation and answer following questions. Parallel production prohibited for annual crops 1. Where an operator's holding faces climatic, geographical or structural constraints, a producer may apply to the control body to run organic and non-organic production units in the same area: a-Perennial crops varieties cannot be differentiated which requires minimum 3 years		

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		<p>could be produced -as parallel cropping; -have a conversion plan for maximum 5 years -permanent separation of products is guaranteed -for each product harvest ETKO is informed 48 hours before -upon completion of the harvest exact quantities of the harvest to be communicated and products are kept separate -conversion plan to be approved by ETKO annually b-In the case land parcels used for research and education purposes c-In the case of production of seed or any other propagation material d-In the case of grassland exclusively used for grazing PLEASE LIST THE CROPS YOU PRODUCE ORGANIC AND CONVENTIONAL</p>		
2.2		<p>Do you keep records separately for organic and nonorganic? PLEASE INDICATE THE SEPARATION METHOD IN RECORDS</p>		
2.3		<p>Do you have different store for organic? PLEASE INDICATE SEPARATION IN STORES ORGANIC AND CONVENTIONAL</p>		
2.4		<p>Did you indicate organic store? PLEASE EXPLAIN THE METHOD OF INDICATION</p>		
2.5		<p>Do you have separate sprayer for organic? PLEASE EXPLAIN HOW YOU CLEAN THE EQUIPMENT IF YOU USE THE SAME SPRAYER</p>		
2.6		<p>Do you know that you need to inform ETKO before the harvest starts and finished?</p>		
2.7		<p>Do you know that you need to report exact quantity of the harvested crops?</p>		
2.8		<p>Do you prevent commingling of organic and nonorganic products as creating physical barriers? PLEASE EXPLAIN HOW YOU PREVENT COMMINGLING ORGANIC AND NONORGANIC</p>		
2.9		<p>Do you keep organic products free from contamination from prohibited substances? PLEASE EXPLAIN HOW YOU SEPARATE PRODUCTION PRACTICES FOR ORGANIC AND NONORGANIC APPLICATIONS AND HOW YOU AVOID FROM CONTAMINATION</p>		
3		ENVIRONMENTAL MANAGEMENT	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
3.1	<p>205.203 834-Article 12.1 IACB 6.5.3 COR 5.4.6</p>	<p>Do you know that organic regulations oblige producer(s) to conserve and improve soil fertility, control soil erosion, protect water sources therefore no contribution is made to environmental damage with burning, littering, logging and water pollution, etc. PLEASE EXPLAIN THE METHOD OF CONSERVATION OF ENVIRONMENT</p>		
3.2	<p>834-Article 5 IACB 4.2 COR 5.2.2</p>	<p>Soil erosion is not problem in your farm(s)? If no how do you prevent erosion? PLEASE EXPLAIN THE METHOD YOU USE TO AVOID EROSION</p>		
3.3	<p>205.203.c COR 5.4.4</p>	<p>Water pollution is not present through excessive manure or other material application? If no how do you solve the problem? PLEASE EXPLAIN HOW YOU AVOID WATER POLLUTION BY FERTILIZATION YOU USE</p>		

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3.4	205.203.4e COR 5.4.6	You do not burn crop residues or other organic material on your farm? If no, how will you change this? PLEASE EXPLAIN HOW YOU BURN RESIDUES IN FARM		
3.5	205.600.2 IACB 6.5.3 COR 5.2.1	If your farm surrounded by natural forest, wetland or protected areas, will these areas be conserved? PLEASE EXPLAIN HOW YOU PROTECT ENVIRONMENT		
3.6	IACB 4.2.a COR 1.2.b	You assure the biodiversity on your farm as taking necessary precautions? PLEASE EXPLAIN YOUR METHOD TO ASSURE BIODIVERCITY IN YOUR FARM		
4	205.203(b)	FARM MANAGEMENT PLAN Are the crop nutrients and the soil fertility managed through any of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
4.1	205.203(1)	FERTILIZATION – COMPOST / MANURE USE Organic producer(s) must follow the rules described in organic regulations, producer(s) must apply organic fertilizers which are allowed by the regulations. See National Lists for allowed inert. According to NOP fermented or raw manure must be applied at least 4 months before the harvest. Compost application may be done in a shorter period. PLEASE LIST THE FERTILIZERS YOU APPLY AND INDICATE THE SOURCES		
4.2	205.201 (a)(2)	*Fertilization methods as green manure, rotation, animal excrements or organic fertilizers used are appropriate for organic farming. *Manure comes from organic or extensive animal keeping. PLEASE EXPLAIN THE SOURCE OF MANURE OR COMPOST USED		Annex Farm Production Report, "Fertilizer"
4.3	205.203 (c) (2) 834-Article 12.1 IACB 6.4.3	Do you use compost? if yes then state source: and attach analyses report for heavy metal contents: If composted manure or other animal products are used, was it produced in compliance with time, temperature, and C:N requirements? PLEASE EXPLAIN YOUR COMPOST METHOD		
4.4		Manure is used as raw or fermented and it complies 120 days requirements of NOP regulation before harvest. PLEASE EXPLAIN USE OF RAW / FERMENTED MANURE IN YOUR FARM		
4.5	205.201 (a)(2)	*Fertilization methods as green manure, rotation, animal excrements or organic fertilizers used are appropriate for organic farming. *Manure comes from organic or extensive animal keeping. PLEASE EXPLAIN THE SOURCE OF MANURE OR COMPOST USED		Annex Farm Production Report, "Fertilizer"
4.6	205.201.(a) 2 834-Article 4 IACB 4.1	Inputs used are approved to be used in organic farming and an approval certificate is present PLEASE LIST THE INPUTS USED FOR ORGANIC FARMING		
5	205.205	CROP ROTATION: Organic farming requires crop rotation for annual crops to build up soil fertility.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	

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5.1	205.203 (c), 205.205 834-Art.4, 5 IACB 4.1, 4.2, 6.4.3	Describe your crop rotation program: Does your crop rotation and organic matter management plan: <input type="checkbox"/> Improve or maintain soil organic matter content, <input type="checkbox"/> Minimize contamination of crops, soil and water resources, <input type="checkbox"/> Manage deficient or excess plant nutrients and prevent soil erosion? PLEASE EXPLAIN YOUR CROP ROTATION PLAN WHEN APPLICABLE		
5.2	205.203(a) IACB 6.4.3.1 COR 5.4.3	Are tillage and cultivation practices in place to maintain or improve physical, chemical, and biological conditions of the soil and minimize soil erosion? PLEASE EXPLAIN SOIL TILLAGE AND CULTIVATION PRACTICES		
5.3	205.203 (e) 3)	If burning of crop residue is performed, is it used only to suppress disease and/or stimulate seed germination? PLEASE EXPLAIN THE REASON AND METHOD OF BURNING		
5.4	834-Art.4, 5 IACB 4.1, 4.2, 6.4.3	Describe your crop rotation; you need to develop rotation program minimum 25% of your organic arable fields. Part of this must be leguminous crops PLEASE EXPLAIN YOUR CROP ROTATION PLAN WHEN APPLICABLE		
5.5	203.a IACB 4.2.a COR 5.2.2	Do you cultivate cover crops to protect soil erosion and provide organic material to soil? PLEASE EXPLAIN IF ANY COVER CROPS PRODUCED, WHICH ONE		
5.6	205.204 IACB 6.4.2 COR 5.3.a	Seeds of green manure or cover crops are appropriate for organic farming, organic or not treated in case none available in the market. You prepared a document as a prove unavailability of seeds? PLEASE ATTACH DOCUMENT AS A PROVE OF UNAVAILABILITY WHEN ORGANIC IS NOT AVAILABLE		
5.7	205.206a IACB 6.5.1 COR 5.6.1	In addition to crop rotation and mechanical weeding, other weed control methods comply the organic regulations? Producer(s) must follow the requirements of organic regulations. (Soil and crop nutrient management, sanitation measures, cultural practices, etc.) PLEASE EXPLAIN IF YOU USE ANY OTHER METHOD TO CONTROL WEED, WHICH METHOD		
5.8	834-Art.4, 5 IACB 4.1, 4.2, 6.4.3	In your crop rotation plan, are the legumes used? PLEASE INDICATE WHICH LEGUMINOUS CROPS ARE PRODUCED IN ROTATION AND %		
6	LAND TILLAGE			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
6.1	205.203b, 205.205, 834- Article 12.1 601.a and e IACB 6.4.3 COR 3.40 Definition	Do you soil test? PLEASE EXPLAIN THE PARAMETERS ANALYSED FOR SOIL TEST AND RESULTS		
6.2	205.203.a IACB 6.4.3 COR 5.4.3	Before subsoil till is practiced justification is always made? PLEASE EXPLAIN THE METHOD OF SUBSOIL TILL AND THE REASON		
6.3	205.203(a) IACB 6.4.3	Are tillage and cultivation practices in place to		

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	COR 5.4.3	maintain or improve physical, chemical, and biological conditions of the soil and minimize soil erosion? PLEASE EXPLAIN YOUR SOIL TILLAGE AND CULTIVATION METHODS		
6.4	205.203 (e) 3)	If burning of crop residue is performed, is it used only to suppress disease and/or stimulate seed germination? PLEASE EXPLAIN THE METHOD OF BURNING RESIDUES IN YOUR FARM		
6.5	205.203 IACB 6.4.3 and 6.4.4 COR 5.4	Is soil building and maintenance plan documented and satisfactory? PLEASE EXPLAIN YOUR SOIL BUILDING AND MAINTENANCE PLAN		
7	205.203 (c) (1)	IRRIGATION (if applicable)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
7.1	COR 5.7	Can you confirm that the irrigation water used is not contaminated by prohibited materials? PLEASE EXPLAIN THE SOURCE OF THE WATER USED FOR IRRIGATION		
7.2	205.203 (c)(3)	How many % of the total area is irrigated? PLEASE INDICATE THE PERCENTAGE OF THE TOTAL AREA		
7.3		Type of irrigation system is appropriate to organic production? PLEASE EXPLAIN THE METHOD OF IRRIGATION IN YOUR FARM		
7.4	COR 5.7	The water used is proper for organic production? PLEASE INDICATE THE SOURCE OF WATER		
7.5		Is the irrigation water also used by conventional farmers and there is no contamination possible? PLEASE EXPLAIN HOW YOU AVOID FROM CONTAMINATION IN SUCH CASES		
7.6		The substances added to the irrigation water complies the organic regulation? PLEASE LIST WHICH SUBSTANCES ADDED IN IRRIGATION WATER		
7.7	205..601A2,5	The cleaning substances used for cleaning of the irrigation system complies the organic regulation? PLEASE LIST WHICH SUBSTANCES USED TO CLEAN IRRIGATION SYSTEM		
7.8	205..601A2,5	The cleaning substances used for cleaning of the irrigation system complies the organic regulation?		
8	205.206 205.271	PLANT PROTECTION	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
8.1	205.201 (a)(2)	*Plant protection against pest, disease and weed controlling are appropriate for organic farming. (Inputs to be used must be approved by ETKO before use) PLEASE LIST THE PLANT PROTECTION SUBSTANCES USED		Annex Farm Production Report, "Pest Control"
8.2	834-Art.12.1 IACB 6.5, 6.5.1 and 6.5.2 COR 5.6	PLEASE WRITE THE LAST APPLICATION OF PROHIBITED SUBSTANCES ACCORDING WHICH ORGANIC REGULATION YOU ARE WORKING WITH?		Annex Farm Production Report, "Pest Control"
8.3	205.206 (a)	Does your pest, weed, and disease management program incorporate the following: <input type="checkbox"/> Crop rotation, <input type="checkbox"/> Soil / crop nutrient management strategies, <input type="checkbox"/> Sanitation measures and, <input type="checkbox"/> Cultural practices that enhance crop health?		

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		PLEASE EXPLAIN YOUR METHOD OF PLANT PROTECTION		
8.4	205.201.(a) 2	<p>Producer(s) who are interested in NOP certification: According to NOP regulation all plant protection materials including their inert must be safe for environment and human health. Only inert listed in EPA list 4 may be used.</p> <p>http://www.epa.gov/opprd001/inerts/lists.html</p> <p>You need to:</p> <ul style="list-style-type: none"> - list all inert ingredients for all your pest protection substances, and - a written confirmation from the manufacturer that all inert are listed in EPA List 4 - a confirmation for the used inputs from a USDA-NOP accredited control body <p>PLEASE LIST THE SUBSTANCES USED FOR PLANT PROTECTION</p>		Annex Farm Production Report, "Pest Control"
8.5		<p>In your storage bins and/or fields have you encountered any problems with any of the following: Insects, Rodents, Diseases, Weeds, and Viruses? Did you manage the problems according to organic regulations?</p> <p>Indicate below which methods or materials you applied to your crops:</p>		Annex Farm Production Report, "Pest Control"
8.6	205.206 (b)	<p>Does your pest management program include any of the following:</p> <p><input type="checkbox"/> Use of predators,</p> <p><input type="checkbox"/> Beneficial habitat development,</p> <p><input type="checkbox"/> Non-synthetic lures, traps or repellents?</p> <p>PLEASE EXPLAIN YOUR PEST MANAGEMENT METHOD</p>		
9	DISEASE MANAGEMENT		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
9.1	205.206 (d) 834-Art.5 IACB 6.5.1 COR 5.6	<p>Does your disease management program include:</p> <p><input type="checkbox"/> Management practices which suppress the spread of disease and/or</p> <p><input type="checkbox"/> Non-synthetic biological, botanical or mineral inputs?</p> <p>PLEASE EXPLAIN YOUR DISEASE MANAGEMENT METHOD</p>		Annex Farm Production Report, "Pest Control"
9.2	205.206(d)	<p>Do you use a biological or botanical substance, or a substance consistent with the National List only when:</p> <p><input type="checkbox"/> Preventive measures and</p> <p><input type="checkbox"/> Non-toxic measures are insufficient to prevent or control crop pests, weeds, and diseases?</p> <p>PLEASE EXPLAIN WHICH MATERIALS YOU USE AND THE REASON</p>		
9.3	205.206 (f)	<p>Can you verify that new installations or replacement lumber in contact with the soil is not treated with prohibited materials?</p> <p>PLEASE INDICATE HOW YOU AVOID CONTAMINATION TO SOIL WHEN YOU USE INSTALLATION OR REPLACEMENT LUMBER IN YOUR FARM</p>		
10	WEED CONTROL		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
10.1	205.206 (c) 834-Article 12.1 IACB 6.5 COR 5.6	<p>Does your weed management program include any of the following:</p> <p><input type="checkbox"/> Mulching, (PVC is not allowed)</p> <p><input type="checkbox"/> Mowing,</p> <p><input type="checkbox"/> Livestock Grazing,</p>		

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		<input type="checkbox"/> Hand weeding and mechanical cultivation, <input type="checkbox"/> Flame, heat or electrical means and/or <input type="checkbox"/> Plastic mulch removed at the end of growing season? PLEASE EXPLAIN IN DETAILS THE METHOD OF WEED CONTROL		
10.2	205.201.(a) 2 834-Article 4 IACB 4.1	Inputs used are approved to be used in organic farming and an approval certificate is present. PLEASE LIST THE INPUTS USED FOR ORGANIC FARMING		
11	205.272(a)	CONTAMINATION RISK	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
11.1	834-Article 12.1 IACB 6.5.3, IACB 7.2 and 7.3 COR 5.2.2 COR 8.1.4 and 8.1.5	Do you take adequate measures to prevent, during all stages of production and storage to avoid contamination: PLEASE EXPLAIN HOW YOU AVOID CONTAMINATION FROM ANY SOURCE		
11.2	COR 8.1.4, 8.1.5	Commingling of organic and non-organic crops is not possible PLEASE EXPLAIN HOW YOU AVOID COMMINGLING		
11.3	IACB 7.2 and 7.3 COR 8.1.4 and 8.1.5	Contact of organic crops by prohibited substances or sanitation materials is not possible PLEASE EXPLAIN HOW YOU AVOID CONTACT FROM PROHIBITED SUBSTANCES		
11.4	COR 8.1.4 and 8.1.5 IACB 7.2 and 7.3	Necessary measures are taken against contamination PLEASE EXPLAIN THE MEASURES YOU TAKE AGAINST CONTAMINATION		
14	205.202 (c)	BUFFERZONES	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
14.1	834-Article 12.1 IACB 6.5.3 COR 5.2.2	Cultivation of neighboring fields do not endanger the organic quality of the crops grown? <input type="checkbox"/> Conventional intensive but utmost attention is paid against drift <input type="checkbox"/> Conventional low input system and utmost attention is paid against drift <input type="checkbox"/> Pastureland no spraying is present <input type="checkbox"/> Organic PLEASE DESCRIBE HOW YOU UNDERSTAND AND IMPLEMENT BUFFER ZONE IN YOUR FARM		
14.2	COR 5.2.2	Are there buffer zones? Are there clearly defined field boundaries and buffer zones to prevent contamination from prohibited substances? (Approximately 8 -10 meters of separation) PLEASE EXPLAIN BUFFER ZONES PRESENT IN YOUR FARM		Attach field maps indicating buffer zones
14.3	COR 5.2.2	On the borders to conventional neighbors there is always a kind of buffer zone which separate two fields such as hedges, paths, size , effectiveness in case of drift. PLEASE INDICATE BUFFER ZONES ON THE BORDERS TO CONVENTIONAL FARMS IN YOUR FIELD MAPS		
14.4	COR 5.2.2	Because buffer zone is not present do you separate certain distance of organic fields crops and do not sell as organic. PLEASE EXPLAIN HOW YOU MANAGE THE SEPARATION,		
14.5		The product comes from the buffer zone is not sold as organic and marketing documents related to the crop is always present and kept for		

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		inspection. INDICATE WHAT YOU DO THE HARVEST COMING FROM THE BORDERS		
15	205.272(a)	TRANSPORT and STORAGE INFORMATION	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
15.1	889-Article 31 IACB 7.5.1, 7.5.2, 7.5.3 COR 8.4.1, 8.4.2, 8.4.3	Are procedures and documentation used to protect the organic integrity of products under your control during storage and transport? PLEASE EXPLAIN HOW YOU CONTROL THE TRANSPORT AND STORAGE		
15.2		Did you checked the transport vehicles if they are appropriate to transport organic products? PLEASE EXPLAIN HOW YOU CONTROL TRANSPORT VEHICLES		
15.3	205.203.(5e)	There is no use of sewage sludge, ionizing radiation and GMO on the organic crops or the ingredients of the products. PLEASE EXPLAIN IF ANY DANGER EXIST FOR CONTAMINATION OF SEWAGE SLUDGE, IONIZING RADIATION AND GMO TO YOUR ORGANIC PRODUCTS		
16	205.204 IACB 6.4.1 6.4.2 COR 5.3	PROPAGATION MATERIAL (Seeds, seedling, young plant etc..)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
16.1	205.204(a)(4) COR 5.3	If you sell certified organically produced perennial planting stock, has it been maintained under organic management for a period of no less than one year? PLEASE EXPLAIN IF YOU PRODUCE ANY PROPAGATION MATERIAL AS ORGANIC CERTIFIED		
16.2	205.204a(1) IACB 6.4.1 6.4.2 COR 5.3	Organic propagation material must be used for organic production. Incase of unavailability of organic sources, you have to prepare an evidence to prove that is true. Seedlings must be produced organically. PLEASE INDICATE IF YOU USE CONVENTIONAL PROPAGATION MATERIAL and ATTACH DOCUMENT AS A PROVE OF UNAVAILABILITY WHEN ORGANIC IS NOT AVAILABLE		Propagation Material Approval form
16.3	205.204a(1) IACB 6.4.1 6.4.2 COR 5.3	Did you look for organic propagation material sources before deciding to buy conventional? PLEASE INDICATE WHICH SOURCES YOU LOOKED FOR		
16.4	834-Article 9 IACB 5.9 COR 5.3	GMO seeds cannot be used for organic farming. Did you secure the seeds are not GMO? PLEASE PROVIDE GMO FREE DECLERATIONS OR PROVES THAT THE VARIETIES USED ARE NOT GMO		Vendor Declaration
16.5	205.201 (a)(2) COR 5.3	*Propagation materials, (origin, treated / untreated, organic / conventional, GMO free) are suitable for organic farming. (Materials to be used must be approved by ETKO before use) PLEASE EXPLAIN IF YOU USE CONVENTIONAL PROPAGATION MATERIAL, SOURCE and REASON		Annex Farm Production Report, "Propagation Material"
17	834-Article 23 IACB 9.1 COR SOR Part 3 21-15	LABELING You must prepare labels for the transport of raw and finished products from the farm store to the processing facility. All labels must be approved by ETKO before use.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Label assessment form	
17.1	834-Article 23 IACB 9.1	The information you have on labels enough such as: Name-code of producer(s), name product, harvest year, status (Organic-In Conversion), and		

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		ETKO? PLEASE INDICATE THE CONTENT OF THE LABELS		
17.2		Did you send your labels to ETKO for approval? PLEASE ATTACH APPROVED LABELS		
17.3		Did you used approved labels for in and out farm transport and storage? PLEASE ATTACH LABELS AND INDICATE THE CONTENT OF THE LABELS		
18	205.661 and COR/SOR 18	COMPLAINT		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
18.1	205.103(b)(4), 205.201(a)(1-6)	Do you have procedure for documenting and addressing complaints related to compliance with organic standards? PLEASE EXPLAIN YOUR COMPLAINT PROCEDURE		
19		FARMING SYSTEM SPECIFICATION		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
19.1	205.201 (a)(1)	This units complies the following information according to the Organic Regulations, all practical precaution measures taken by the producer(s) to ensure compliance with the Organic Regulation. Producer(s) ensure that there is no use of non-allowed substances in mentioned units:		
19.2		*There is a consultant and advice producer(s) regularly or producer(s) can get assistance from ministry of agriculture technicians, or producer(s) himself is an experienced organic producer(s) and has enough knowledge. PLEASE EXPLAIN HOW YOU GET ADVICE or INFORMATION FOR ORGANIC PRODUCTION		
19.3	205.201 (a)(3)	Quality monitoring of the producer(s) is done and effective PLEASE EXPLAIN HOW DO YOU KEEP YOUR QUALITY OF PRODUCTION		
19.4		*Explain in this section the first processing in the farm, storing, sorting, winnowing, drying, packing etc.. PLEASE GIVE BRIEF INFORMATION OF THE POST HARVEST PROCESSING IN THE FARM		
19.5	205.103(a) 205.101(a)(1-2)	Subcontracted handlers are under control of the licensee to keep the integrity of organic product? PLEASE INDICATE HERE IF YOU HAVE SUBCONTRACTED HANDLING OPERATIONS		
19.6		In stores only substances which are listed in Organic Regulation were used PLEASE LIST WHICH SUBSTANCES ARE USED IN STORES FOR PEST CONTROL		
19.7		Processing activities are in compliance with the organic regulation. PLEASE EXPLAIN POST HARVEST PROCESSING ACTIVITIES IN/OUT FARM		
19.8		Cleaning measures are in compliance with the organic regulation PLEASE EXPLAIN CLEANING AND SANITATION METHODS		
19.9		Cleaning agents used for stores, processing, transport tools are in compliance with the organic regulation. PLEASE LIST THE CLEANING AGENTS USED		
19.10		Do you undertake precautionary measures to avoid from contamination PLEASE EXPLAIN YOUR PRECAUTIONARY MEASURES TO AVOID CONTAMINATION		

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19.11		There is no risk for contamination in stores and transport activities PLEASE EXPLAIN STORAGE CONDITIONS OF ORGANIC PRODUCTS		
19.12	205.201 (a)(5)	To protect the organic commodities from potential co-mingling and contamination necessary measures were taken. PLEASE EXPLAIN HOW YOU SECURE ORGANIC QUALITY OF YOUR PRODUCT WHEN THERE IS CONTAMINATION SOURCE		
19.13		Different regulation products are separated by physical matters, such as different rooms, indicators, timing of the harvest, transport, store etc PLEASE EXPLAIN SEPARATION OF DIFFERENT REGULATIONS PRODUCTS		
19.14		All records kept related to the organic products mention status as organic or in conversion PLEASE EXPLAIN IF YOU INDICATE STATUS OF PRODUCTS IN ALL RECORDS		
19.15		Products kept in store or transported are labeled according to the regulations, status is mentioned PLEASE EXPLAIN HOW YOU LABEL DIFFERENT REGULATIONS PRODUCTS		
20	205.201 (a)(4) 889-Article 66 IACB 10.1	RECORD KEEPING REQUIREMENT. PLEASE EXPLAIN WHICH RECORDS YOU KEEP IN FARM FOR PRODUCTION, STORE, TRANSPORT, SALES ETC..	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
20.1		You fully disclose all activities and transactions in sufficient detail as to be readily understood and audited? PLEASE LIST DOCUMENTS YOU KEEP AS RECORDS		
20.2		The records kept demonstrates sufficiently compliance with the regulations? PLEASE EXPLAIN IF YOU KEEP RECORDS SEPARATELY FOR ORGANIC CROPS		
20.3		The records are available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing state official and ETKO? PLEASE EXPLAIN HOW YOU KEEP THE RECORDS FOR THE AUDIT OF THE AUTHORITIES		
20.4		The records are maintained for not less than 5 years beyond their creation? PLEASE KEEP RECORDS FOR 5 YEARS FOR AUDIT		
20.5		Do you have available for review by the inspector, an audit trail that tracks products by identity and volume from field of origin to final product distribution? PLEASE EXPLAIN TRACEABILITY OF YOUR PRODUCTS		
21		FIELD HISTORY CONVERSION TO ORGANIC FARMING Fill in this section only for the new fields joined the project	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
21.1	889-Article 36 IACB 6.2.2	Note: Period of transition, criteria for the extension/shortening of certification is depend on the circumstances of evidences. Conversion period can be shorten if the history is proper and		Application Retroactively Recognition

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		complies the requirements or extend if the situation forces. (Any misleading, using chemicals etc.) "Organic regulations require a minimum of three years of non-application of prohibited substances"			
21.2		Has all land seeking certification been free of prohibited materials applications for a period of at least three years immediately preceding harvest of the organic crops? PLEASE INDICATE THE HISTORY OF EACH PRODUCTION UNIT FOR THE LAST 3 YEARS			Annex Farm Production Report, "Farm Plot Inventory"
21.3	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations			
22		DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER			
	205.103(b)(3)	Do you maintain all records for at least five (5) years?			
	Inputs	Purchase records for external inputs (Fertilizer, pesticides, seeds etc) are present			
		Use of the external inputs. Date? Place? Quantity? Are present			
	Harvest 205.103(b)	Harvest records for crops. Date, Place, Quantity, Field No are present			
		In case of parallel production, harvest records of different standards, regulations and conventional crop harvest are present. (Date, Place, Quantity, Field No, etc).			
	Sales	Sales records; invoices include date, quantity, product, status. Every producer, processor or operator in the organic project who sells their organic product to the final consumer will be responsible to hold an account on daily basis on the quantity that is sold. Daily account records?			
	Analyses	Product, soil and water analyses reports are present			
		Product specification is present			
	Documentation	Last inspection report and certificate (if the unit has been certified by other agencies) are present			
	205.103(a)	Are current organic certificates for all contracted handling operations (i.e. storage, cleaning facilities, etc.) maintained?			
		Producer(s), field registers and 3 years history of the fields are present			
		Labels for the products (for lose or closed products) in stock are present. Labels and accompanying documents are checked with the incoming organic products.			
		Farmer agreement is present			
	205.201(a)(6)	Has an accurate map of your organic parcel been described? All surrounding land activity and buffer zones should be included on this map.			
		When an ICS is operational additionally following must be present; Fill in OCP Grower Group OP 02 F 03			

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CONFIRMATION

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

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

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

Place, date:

Signature of the representative:

Name of the representative:

ETKO Results of Verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION		

Place, Date:

Name ETKO Representative

Signature of ETKO representative

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ETKO ORGANIC PROGRAM WILD COLLECTION ORGANIC COMPLIANCE PLAN

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

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

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

If you have more than one processing facility, you can combine information related to all subcontracted processing units in one form. You do need to develop one OCP form for each processing unit to reduce paper usage.

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

This form must be filled in for each farm in the case big individual farms are present. In case there is grower group organization only one form could be prepared for the specific group managed by ICS.

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

What is Wild Collection?

Wild collection includes plants and mushrooms that grow spontaneously in the nature which are not cultivated and grown itself naturally.

Extensive fruit growing with certain cultural practices may not be considered as wild craft.

Abandoned fruit orchards at least for 5 years which are not taken care somehow soil tillage, irrigation, pest-disease-weed management and fertilization are not practiced may be accepted with an official declaration from the local authorities.

Wild grown fruits typical for certain areas such as wild pears, plums, pomegranates or similar other species may be accepted with an official supporting document from the local authorities, indicating that plants are grown naturally without any production methods application.

NAME LICENSEE				
NAME FARM				
FARM ADDRESS				
COUNTRY				
PHONE-FAX-EMAIL				
ACTIVITIES				
CONTACT PERSON				
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC	<input type="checkbox"/> Other

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A		QUALITY MANAGEMENT – GENERAL PRINCIPLES	Producer Comment	Inspector Comment
A1.1		As license holder you understand that you are responsible to keep the integrity of the organic product through production chain, to control subcontracted processing units and contracted producers. Please read carefully following questions of the organic compliance plan for a single or more then one producer, and consider them all. As project manager this is your responsibility to answer correctly to develop your organic compliance plan. If you are only a trader and do not have any production fields of yourself, still you are responsible to fill in this form including all of your contracted producers.		
1.2	205.201(b)	Do you substitute any plan required by the local government? Which one? PLEASE INDICATE IF THERE IS A LOCAL STATE PROGRAM ENFORCED		
1.3		Principles of organic wild collection: Please list briefly the basic principles of organic wild collection according to your understanding. PLEASE DESCRIBE BASIC PRINCIPLES		
1.4	205.201 (a) 1	A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed is prepared? PLEASE DESCRIBE THE PRACTICES AND PROCEDURES TO BE PERFORMED AND MAINTAINED, INCLUDING THE FREQUENCY WHICH THEY WILL BE PERFORMED		
1.5	205.201 (a) 3	A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed is prepared?, to verify that the plan is effectively implemented? PLEASE INDICATE THE FREQUENCY OF ANNUAL SELF ASSESSMENT TO VERIFY THAT THE PLAN IS EFFECTIVELY IMPLEMENTED		
1.6		Producer(s)/project responsible took corrective actions to complete his deficiency and non conformances? PLEASE LIST CORRECTIVE ACTIONS YOU TOOK TO SECTION D		
1.7		Annual self assessment was documented and kept for upcoming inspection? PLEASE LIST WHICH DOCUMENTS YOU KEEP RELATED TO SELF ASSESSMENT		
1.8		Producer(s) have Organic Production Regulation which are applicable? PLEASE LIST WHICH REGULATIONS YOU HAVE AND VERSION NUMBER		
1.9		Producer(s) understood the applicable regulation(s)? IN CASE THE COLLECTORS DO NOT UNDERSTAND THE REGULATION, EXPLAIN HOW YOU WILL IMPROVE THIS?		
1.10		You have never been denied organic certification? If no, explain; year, certifier, reason etc. IF YOU LOST ORGANIC CERTIFICATION BEFORE PLEASE EXPLAIN THE REASON		
1.11	205.400©	You permit on-site inspections with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices by the certifying agent. PLEASE EXPLAIN THE REASON IF YOU DO NOT WANT TO ALLOW		
1.12		According to ETKO principles collection must not exceed		

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		60% flowers and leaves, 70% fruits, 20% root and barks. PLEASE EXPLAIN HOW DO YOU SECURE PERCENTAGES		
1.13	Annex I A. 4	The collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area PLEASE EXPLAIN HOW YOU MAINTAIN NATURAL HABITAT and THE SPECIES?		
1.14		Collection area is well described and documented? and it is indicated clearly in a map? PLEASE PREPARE THE MAP OF THE COLLECTION AREA		
1.15		There is no restriction in the area for collection? HOW DID YOU LEARN THAT THERE IS NO RESTRICTION FOR COLLECTION		
1.16	Annex III A. 1	There is a documented permission for collection of the crops, issued by the state officials? PLEASE ATTACH PERMISSION FOR COLLECTION		
1.17	Annex I A. 4	There is a document indicating that State did not use any material not allowed by the organic regulations in the collection area since last 3 years? PLEASE ATTACH THE DECLARATION WHEN YOU APPLY CERTIFICATION FIRST TIME		
1.18		Endangered species are described in the country of collection and the list is present? PLEASE ATTACH THE LIST OF ENDANGERED SPECIES IN THE COUNTRY		
1.19		The Convention on International Trade in Endangered Species of Wild Flora and Fauna is respected? (CITES). www.cites.org PLEASE DOWNLOAD THIS DOCUMENT AND STUDY		
1.20		Operators take measures to ensure that wild, sedentary aquatic species are collected only from areas where the water is not contaminated by substances prohibited in organic regulations? PLEASE INDICATE WHERE YOU COLLECT THE AQUATIC SPECIES		
1.21		If fruits such as plum, pear, pommygranite, apple, mirabelle, berries etc are collected from abandoned orchards, this is declared by the local state authorities by an official letter indicating that there was no cultivation methods applied in these collection orchards minimum since 5 years? PLEASE ATTACH LOCAL AUTHORITY DECLARATION		
1.22		When collection is done among the farming sites then all farms are certified organic? Or there is no non-allowed substances use among the conventional farming sites where the collection takes place? PLEASE INDICATE WHICH IS APPLICABLE		
1.23	205.201(a)6	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with		

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		the Regulations. PLEASE INDICATE HERE IF YOU WANT TO DECLARE ANY ADDITIONAL INFORMATION for CERTIFICATION		
A2	205.207	SUSTAINABILITY of NATURE and PROTECTION		
2.1		Any species defined as "Critically Endangered" in the IUCN red list are not harvested? The World Conservation Union. www.iucn.org PLEASE DOWNLOAD THE RED LIST and MAKE SURE THAT YOU DO NOT COLLECT THESE SPECIES		
2.2		Operators prepared a resource assessment explaining the sustainability, availability and impact of the collection? PLEASE PREPARE AN ASSESSMENT		
2.3		Operators described and documented maximum harvest quantities? PLEASE LIST THE MAXIMUM HARVEST CAPACITIES BELOW SECTION 12		
2.4		Mother plant is not cut whole or partly to collect the fruits easier? (For example, cutting branches of blackberries or raspberries). PLEASE INDICATE WHICH PARTS OF PLANTS ARE COLLECTED		
2.5		Minimum damage by using an appropriate technic is considered to the plant? PLEASE EXPLAIN HOW YOU AVOID DAMAGE TO PLANTS		
2.6		Mushroom is not harvested as whole from the roots and knives are used to cut the edible part and roots are left in soil or on the trunks? PLEASE EXPLAIN HOW YOU AVOID DAMAGE THE MUSHROOM ROOTS		
2.7		Collection area must be kept clean, no waste or any disposal are left? PLEASE EXPLAIN HOW YOU AVOID LEAVING WASTE IN THE AREA		
2.8		No fire set which may distract the collection are and harm the naturel flora and fauna? PLEASE EXPLAIN IF YOU WARN COLLECTORS AGAINST FIRE, HOW?		
A3		TRAINING and CONTROL PROCEDURES		
3.1		Is there a documented procedure to train the collectors including middlemen, internal inspectors, buyers, transporters and any other related persons for wild collection? This procedure includes following points? PLEASE EXPLAIN IF YOU TRAIN COLLECTORS AND OTHER PERSONNEL INVOLVED WITH COLLECTION		
3.2		The species to be collected and particular rules for each species to be collected PLEASE EXPLAIN IF YOU HAVE A PARTICULAR RULE FOR COLLECTION		
3.3		The standards, regulation and certification requirements as stated in this instruction, to		

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		be taken into account during collection PLEASE INDICATE IF YOU EXPLAIN FOLLOWING POINTS IN YOUR COLLECTION PROCEDURES		
		The method of collection		
		How to register the collectors		
		The structure of organization		
		Training method and records of the collectors		
		Correct plants to avoid any harm for non-targeted species		
		Plant and species identification		
		Life cycle of plants		
		Hygiene and food safety, where suitable		
A4		ORGANIZATION STRUCTURE		
4.1		Operator has signed a written agreement with middlemen? PLEASE SIGN AN AGREEMENT WITH THE COLLECTION LEADERS		
4.2		Middlemen has registered the collectors and a list of the collectors is present? PLEASE PROVIDE THE COLLECTORS LIST DONE BY MIDDLEMAN		
4.3		Collectors are aware of the wild collection rules of the operator? PLEASE INDICATE IF MIDDLEMAN EXPLAINED THE RULES OF THE COLLECTION TO COLLECTORS		
4.4		Operator guarantees the collection complies the rules of the regulations as controlling regularly the collectors during the collection? PLEASE INDICATE WHO IS RESPONSIBLE TO INSPECT COLLECTORS		
A5		SOIL FERTILITY Collectors must assure that the fertility of the collection area maintained and collection of material do not affect the stability.		
5.1		Soil erosion is not a problem in collection area? PLEASE INDICATE IF THERE IS EROSION RISK IN THE AREA		
5.2		Collection does not provoke soil erosion in collection area? PLEASE EXPLAIN HOW YOU AVOID SOIL EROSION		
5.3		Collection does not affect the soil fertility? PLEASE EXPLAIN IF YOU MASS COLLECT PLANTS/ROOTS WHICH MAY AFFECT SOIL FERTILITY		
5.4		Plants and soil are not forced to produce more by any cultivation technics? PLEASE INDICATE IF THERE IS PRODUCTION PRACTICES APPLIED TO WILD GROWN		

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		PLANTS		
5.5		Animal graze in the area is well managed that does not affect the stability/productivity of the plants collected? PLEASE EXPLAIN IF ANY LIVESTOCK IS GRAZED IN COLLECTION AREA AND WHAT IS THE EFFECT OF IT		
A6		ENVIRONMENTAL MANAGEMENT		
6.1	205.203	Do you know that organic regulations oblige collector (s) to conserve soil fertility, control soil erosion, protect water sources therefore no contribution is made to environmental damage with burning, littering, logging and water pollution, etc. PLEASE EXPLAIN YOUR ENVIRONMENT PROTECTION METHODS		
6.2		Soil erosion is not a problem in the collection area where you operate? If no how do you prevent erosion? PLEASE EXPLAIN HOW YOU PREVENT SOIL EROSION IN THE COLLECTION AREA		
6.3		Water pollution is not present? If no how do you avoid from contamination? PLEASE EXPLAIN HOW YOU PREVENT WATER POLLUTION, IF IT IS CREATED BY THE COLLECTION ACTIVITIES		
6.4		You do not burn the area where you do collection? If no, how will you change this? PLEASE EXPLAIN WHAT IS YOUR PREVENTION METHOD AGAINST FIRE		
6.5		If your collection takes place in natural forest, wetland or protected areas, will these areas be conserved? PLEASE EXPLAIN HOW YOU CONSERVE NATURAL RESERVES		
6.6		You assure the biodiversity on the collection areas as taking necessary precautions? PLEASE EXPLAIN HOW YOU ASSURE BIODIVERSITY		
A7	205.201 (a)(4)	RECORD KEEPING REQUIREMENT.		
7.1	205.103	PLEASE EXPLAIN WHICH RECORDS YOU KEEP IN FARM FOR PRODUCTION, STORE, TRANSPORT, SALES ETC..		
7.2		You fully disclose all activities and transactions in sufficient detail as to be readily understood and audited? PLEASE LIST DOCUMENTS YOU KEEP AS RECORDS		
7.3		The records kept demonstrates sufficiently compliance with the regulations? PLEASE EXPLAIN IF YOU KEEP RECORDS SEPARATELY FOR ORGANIC CROPS		
7.4		The records are available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing state official and ETKO?		

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		PLEASE EXPLAIN HOW YOU KEEP THE RECORDS FOR THE AUDIT OF THE AUTHORITIES			
7.5		The records are maintained for not less than 5 years beyond their creation? PLEASE KEEP RECORDS FOR 5 YEARS FOR AUDIT			
7.6		Do you have available for review by the inspector, an audit trail that tracks products by identity and volume from field of origin to final product distribution? PLEASE EXPLAIN TRACEABILITY OF YOUR PRODUCTS			
A8		INTERNAL CONTROLLING SYSTEM			
8.1		This section is related to collectors who have an agreement with a project. Project may have an internal control system to secure the organic quality of the collected crops. ICS system is used only for a better security to the collector group project.			
8.2		Collectors have an organizational structure, such as cooperatives, or under a processor/trader? PLEASE EXPLAIN HOW THE COLLECTORS ARE ORGANIZED			
		<input type="checkbox"/> Always same groups do the collection	<input type="checkbox"/> It is an open invitation for collection everyone can collect and bring the products		
		<input type="checkbox"/> Collection takes place in groups, organized and supervised by the project	<input type="checkbox"/> Other system		
8.3		Do you supervise the collectors? How often? PLEASE INDICATE THE LAST SUPERVISION DATE			
8.4		Internal controlling system is present and assessment of all collectors were completed? PLEASE PROVIDE THE LIST OF COLLECTORS AND INDICATE ANNUAL EVALUATION OF COLLECTORS			
8.5		An annual report on collection was prepared and ready to be checked? PLEASE PREPARE AN ANNUAL REPORT EXPLAINING COLLECTION ACTIVITIES			
8.6		Collection area maps are present and complete? PLEASE PREPARE THE MAPS OF THE COLLECTION AREA			
8.7		Approved collector(s) list is present and includes expected-realised collection results? PLEASE ATTACH THE COLLECTORS LIST			
8.8		Collector training was done? PLEASE LIST THE TRAININGS PROVIDED INCLUDING DATE			
8.9		Record of attendance is present? PLEASE KEEP THE ATTENDANCE LIST			
8.10		Marketing results of the collectors are kept?			

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		PLEASE KEEP THE DELIVERY LIST				
8.11		Sanctioned collector(s) lists are prepared including the sanction reason? PLEASE KEEP SANCTIONED COLLECTORS LIST and INDICATE SANCTION				
8.12		Any sanctions related to group members will be reported to ETKO immediately? PLEASE INFORM ETKO IMMEDIATELY WHEN YOU SANCTION ANY COLLECTOR				
8.13		Before the ETKO inspection takes place internal control of all collector(s) will be completed? PLEASE COMPLETE INTERNAL CONTROL OF ALL COLLECTORS AND COLLECTION POINTS BEFORE ETKO INSPECTION				
8.14	205.103(a) 205.101(a)(1-2)	Subcontracted handlers are under control of the licensee to keep the integrity of organic product? PLEASE EXPLAIN HOW YOU CONTROL SUBCONTRACTED HANDLERS				
A9		COMPLAINT				
9.1	205.103(b)(4), 205.201(a)(1-6)	Do you have procedure for documenting and addressing complaints related to compliance with organic standards PLEASE PREPARE A COMPLAINT PROCEDURE				
A10		LABELING You must prepare labels for the transport of raw and finished products from the farm store to the processing facility. All labels must be approved by ETKO before use.				
10.1		The information you have on labels enough such as: Name-code of collector(s), name product, collection year, status (Organic), and ETKO? PLEASE INDICATE THE CONTENT OF THE LABEL				
10.2		Did you send your labels to ETKO for approval? PLEASE SEND YOUR LABELS FOR APPROVAL				
10.3		Did you used approved labels for in and out farm transport and storage? PLEASE EXPLAIN HOW YOU USE LABELS				
A11		COLLECTION DETAILS				
11.1		Name type of collection operation: mushroom, herbs, spices, fruits, fibers, plants etc.. PLEASE INDICATE THE NAME OF THE WILD CROPS COLLECTED				
		Total hectare of collection area		Total number of collectors/collection points		

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11.2		Please indicate the landscape of collection area; Mountains, plain area, river basin, forest, naturel park, lake, ..etc.					
11.3		General description of the collection and handling. Explain how is the collection done, where and how the collectors deliver their products daily.					
		<input type="checkbox"/> Fix Collection Points	<input type="checkbox"/> Mobile Units	<input type="checkbox"/> Project organizes collectors	<input type="checkbox"/> People collect and bring the crops		
		<input type="checkbox"/> Post harvest process present in farm	<input type="checkbox"/> No post harvest process in farm	<input type="checkbox"/> Collectors transport the crops	<input type="checkbox"/> Processor transport the crops		
11.4		In the case of fix collection points, please list them. If necessary, extend the table or attached a separate list. PLEASE LIST ONLY THE COLLECTION POINTS					
		Name	Adres	Responsible person	Products approx quantity per year		
11.5		Do you have, or corporate with, central units, where products are stored, packed, dried, frozen or processed? PLEASE LIST ONLY PROCESSING UNITS					
		Name	Adres	Responsible person	Activities		
11.6		Which products and quantities do you request certification for this season? If necessary attach a separate list. PLEASE LIST THE CROPS AS YOU WANT TO APPEAR ON THE CERTIFICATE					
		Local Name	English name	Botanical name	Trade name		

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A12		HARVEST and COLLECTION DESCRIPTION					
		(Please describe all collection areas below for the current season indicating estimation/real capacity)					
		You know that producer(s) must report the collection records to ETKO after the collection finished?					
		Name Collection area/point	Name responsible	Crop(s)	Estimated or Realized Collection Tons		
		Approximate hectare of collection area		Number of Collectors			
A13		PROCESSING in FARM and MARKETING					
		All the records related to collectors including the quantities bought from each collector, indicating clear traceability? PLEASE EXPLAIN YOUR TRACEABILITY SYSTEM					
2.3		List of the processed products and realised quantity, which are applicable for certification this year. (Please list it as you would like to appear on the certificate). When the product is multi ingredient then prepare product specifications separately).					
		Name Product	Specification	100% organic	95% org	70% org	Made with org
			Single Ingredient	Multi	ton	ton	ton

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16.4		Did you indicate organic store? PLEASE EXPLAIN THE METHOD OF INDICATION		
16.5		Do you have separate transporter for organic? PLEASE EXPLAIN HOW YOU CLEAN THE EQUIPMENT IF YOU USE THE SAME TRANSPORTER		
16.6		Do you know that you need to inform ETKO before the collection starts and finished? PLEASE INFORM ETKO BEFORE AND AT THE END OF COLLECTION		
16.7		Do you know that you need to report exact quantity of the collected crops? PLEASE SEND COLLECTED AMOUNTS TO ETKO WHEN FINISHED		
16.8	205.201(a) J5	Do you prevent commingling of organic and nonorganic products as creating physical barriers? PLEASE EXPLAIN HOW YOU PREVENT COMMINGLING ORGANIC AND NONORGANIC		
16.9		Do you keep organic products free from contamination from prohibited substances? PLEASE EXPLAIN HOW YOU SEPARATE PRODUCTION PRACTICES FOR ORGANIC AND NONORGANIC APPLICATIONS AND HOW YOU AVOID FROM CONTAMINATION		
A17	205.272(a) J	CONTAMINATION RISK		
17.1		Collection is done from the indicated areas; indicate which areas		
		<input type="checkbox"/> Forest <input type="checkbox"/> Mountain <input type="checkbox"/> Wetland <input type="checkbox"/> Lake/River		
		<input type="checkbox"/> Pasture <input type="checkbox"/> Along the fields <input type="checkbox"/> Along the roads <input type="checkbox"/> Settlement areas		
17.2		Collection is free from polluted areas by the industrial, nuclear plants, heavy traffic roads and mining facilities? PLEASE INDICATE ANY CONTAMINATION SOURCE IF PRESENT NEARBY		
17.3		The collection or harvest area has an appropriate distance from conventional farming, pollution and contamination? PLEASE INDICATE THE DISTANCE		
17.4		Do you take adequate measures to prevent, during all stages of production and storage to avoid contamination PLEASE EXPLAIN YOUR SYSTEM TO AVOID CONTAMINATION		
17.5		Contact of organic crops by prohibited substances or sanitation materials is not possible PLEASE EXPLAIN HOW YOU AVOID CONTACT		
17.6		In collection areas there is no use of any chemicals since last 3 years. Treatments are acceptable within the organic regulations allowance. PLEASE ATTACH DECLARATION FROM THE LOCAL AUTHORITIES		

Ref Nr	Reg. Nr	Organic Compliance Plan-Wild Collection NOP 205.201, IACB 5.3, CAN/CGSB.7.6		Doc Nr	GP 18 F 05
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		PLEASE WRITE THE LAST APPLICATION OF PROHIBITED SUBSTANCES THAT COULD HAVE BEEN DONE BY THE OFFICIALS ?					
17.7		How do you avoid collecting crops within the production fields, settlement areas? PLEASE EXPLAIN HOW YOU AVOID					
17.8		How do you avoid to intermingle the same crop which is wild collected and cultivated? PLEASE EXPLAIN HOW YOU DETERMINE AND CONTROL					
17.9		How do you avoid collection from the areas where animal graze? Do you train collectors not to collect any crop has contact to animal manure? PLEASE EXPLAIN THIS IN COLLECTION PROCEDURE					
17.10		According to ETKO Standard Interpretation organic wild collection must not take place within the following areas PLEASE INDICATE HOW YOU COMPLY THE FOLLOWING					
		20 m cropland where pesticide sprayed					
		50 m from fruit orchards					
		20-100 m from litter dumps					
		20 m from railways					
		25-200 m from roads					
		5 km from industrial centres					
		50 km from nuclear facilities					
17.11		Wild collection is not done inside urban areas, close to roads?					
17.12		Incase there are roads passing through the collection area; following acceptable distances to the roads are respected ? A good separation is compulsory where the collection takes place if there is conventional agriculture is present. At least 20 metres should be regarded for collection among the extensive conventional production areas and 50 metres from the intensive conventional areas. This may be different in the case of wind, landscape, production and chemical use situations.					
		Vehicles per hour	50	50-200	200-600	600-1000	> 1000
		Distance to be kept (m)	5	25	50	100	200
17.13		There is no collection if along dusty roads as far as dust is visible on plants?					
17.14		There is no collection if there are air polluting industrial centres and mines within 5 km distance?					
17.15		There is no collection if there is a nuclear facility within 50 km?					
17.16		There is no collection if there is railway within 20 metres?					
17.17		There is no collection if there is sewage sludge within 20 to 100 m?					

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A18	205.201.(a) 2	INPUTS							
18.1		Inputs used are approved to be used in organic production and an approval certificate is present PLEASE LIST THE INPUTS USED FOR ORGANIC PRODUCTION							
18.2		Records about origin, type and quantity of used inputs. Ingredients and processing aids. Please list:							
		Name input	Origin of ingredients	Composition of ingredients	Where it will be used	Document commercially availability is present	Input is permitted by the regulation? Which ones?		
A19	205.206	PLANT PROTECTION							
19.1	205.206 (a) (b)	Does your pest management program incorporate the following: <input type="checkbox"/> Biological control methods such as use of predators <input type="checkbox"/> Mechanical control methods such as traps <input type="checkbox"/> Sanitation measures and, <input type="checkbox"/> Spraying allowed substances PLEASE INDICATE IF YOU USE ANY PLANT PROTECTION IN ANY STAGE OF COLLECTION OR POST HARVEST HANDLING							
19.2		Producer(s) who are interested in NOP certification: According to NOP regulation all plant protection materials including their inert ingredients must be safe for environment and human health. Only inert ingredients listed in EPA list 4 may be used. http://www.epa.gov/oppr001/inerts/lists.html You need to: - list all inert ingredients for all your pest protection substances, and - a written confirmation from the manufacturer that all inert ingredients are listed in EPA List 4 - a confirmation for the used inputs from a USDA-NOP accredited control body PLEASE INDICATE WHICH SUBSTANCES YOU APPLY AND ARE THEY PRESENT IN NOP REGULATION, EPA LIST 4							
19.3		In your storage bins and/or collection areas have you encountered any problems with any of the following: Insects, Rodents, Diseases. Did you manage the problems according to organic						() ()	

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		regulations? Indicate below which methods or materials you applied to your crops: PLEASE LIST WHICH PROBLEMS WERE PRESENT AND HOW YOU CONTROLLED						
		Year	Area/Bin	Crop	Problem	Action taken		
A20		PEST & DISEASE MANAGEMENT						
20.1	205.206 (d)	Does your pest & disease management program include: <input type="checkbox"/> Management practices which suppress the spread of pest & disease and/or <input type="checkbox"/> Non-synthetic biological, botanical or mineral inputs? PLEASE EXPLAIN IF APPLICABLE						
20.2	205.206(d)	Do you use a biological or botanical substance, or a substance consistent with the National List only when: <input type="checkbox"/> Preventive measures and <input type="checkbox"/> Non-toxic measures are insufficient to prevent or control crop pests, weeds, and diseases? PLEASE EXPLAIN IF APPLICABLE						
20.3	205.206 (f)	Can you verify that new installations or replacement lumber in contact with the soil is not treated with prohibited materials? PLEASE EXPLAIN IF APPLICABLE AND HOW YOU AVOID THAT						
A21		ANALYSES						
21.1		Did you make any analyses for plant protection material, fertilizers, GMO and heavy metal? If yes attach the analyses reports. PLEASE ATTACH ANALYSES REPORTS						
A22	205.202 (c)	BUFFERZONES						
22.1		Cultivation in neighbouring areas do not endanger the organic quality of the crops collected? Farming in the neighbouring areas could be described as; <input type="checkbox"/> Conventional intensive and precautions taken to avoid collection from affected areas <input type="checkbox"/> Conventional low input system and precautions taken to avoid collection from affected areas						

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		<input type="checkbox"/> Pastureland, forest and no spraying is present <input type="checkbox"/> Organic production is present PLEASE DESCRIBE HOW YOU UNDERSTAND AND IMPLEMENT BUFFER ZONE IN YOUR FARM		
22.2		Are there buffer zones? There is enough distance to avoid contamination? (See ETKO Wild collection procedure 5.1.4) PLEASE EXPLAIN BUFFER ZONES PRESENT IN YOUR FARM		
22.3		The product comes from the buffer zone is not sold as organic and marketing documents related to the crop is always present and kept for inspection. INDICATE WHAT YOU DO THE HARVEST COMING FROM THE BORDERS		
A23	205.272(a)	TRANSPORT and STORAGE INFORMATION		
23.1		Do you have a separate clean store for organic crops? PLEASE EXPLAIN STORES		
23.2		Store used for organic crops is protected from any contamination? PLEASE EXPLAIN HOW YOU PROTECT ORGANIC CROPS		
23.3		Store is indicated as organic and there is no use of nonallowed sprayers when there is organic crops? PLEASE EXPLAIN HOW YOU INDICATE AND IS IT CLEAN		
23.4		Are procedures and documentation used to protect the organic integrity of products under your control during storage and transport? PLEASE EXPLAIN HOW YOU PROTECT THE CROP		
23.5		Did you checked the transport vehicles if they are appropriate to transport organic products? PLEASE EXPLAIN HOW YOU SECURE TRANSPORT VEHICLES CLEANLENESS		
23.6		Please explain how the transport is done from the collection area to the processing facility? PLEASE EXPLAIN HOW THE GOODS ARE TRANSPORTED		
23.7	205.203.(5e)	There is no use of sewage sludge, ionizing radiation and GMO on the organic crops or the ingredients of the products? PLEASE EXPLAIN HOW YOU AVOID CONTAMINATION FROM THE MENTIONED SOURCES		

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B		COLLECTION SYSTEM SPECIFICATION					
		Please explain in this section general practices of collection and give details of the wild grown crops. You can doublecate this section for each different area and collection practices.					
		PLEASE COPY THIS SECTION (B) WHEN NEEDED					
B1	205.201 (a)(1)	This unit complies the following information according to the Organic Regulations, all practical precaution measures taken by the collectors to ensure compliance with the Organic Regulations.					
1.1		Generally landscape, climate, type of land, environment and farming system in the collection area are appropriate for organic wild crops collection..					
		PLEASE EXPLAIN COLLECTION AREA CONDITIONS					
		Name region(s) where crops are collected					
		Name collection points					
1.2		Name Crops	Latin name	General information on collection: Explain here your collection activities such as, method of collection, period of collection, post-collection handling, drying, sorting, packing, transport, storage, separation etc...	Harvest capacity of crops (ton)		
1.3	205.201 (a)(2)	*Collected crops are free from treatment, GMO, sewage sludge and complies to					

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		organic regulation. PLEASE INDICATE IF CROPS COLLECTED ARE NOT CONTAMINATED							
1.4	205.201 (a)(2)	*There is no pest-disease control material application before and after the collection. If required to use inputs, must be approved by ETKO before use. PLEASE INDICATE IF THERE IS ANY APPLICATION OF PESTICIDES							
		Crops	Diseases	Control	Pests	Control	Weed control		
1.5		Collection of wild crops does not affect, maintain or improve the physical, chemical and biological conditions of the soil ? PLEASE INDICATE HOW THE SOIL IS AFFECTED BY THE COLLECTION PRACTICES							
1.6		Collection does not cause soil erosion? PLEASE EXPLAIN HOW YOU PREVENT SOIL EROSION							
11.7		There is a consultant and advice to collector(s) or collectors are trained by the ministry of agriculture technicians, or collector(s) are experienced for collection and have enough knowledge on the crops collected. PLEASE INDICATE NAME OF THE PERSON WHO IS RESPONSIBLE							
1.8	205.201 (a)(3)	Quality monitoring of the collection is done and effective PLEASE INDICATE LAST EVALUATION OF THE COLLECTION PRACTICES							
1.9		In stores only substances which are listed in Organic Regulation were used PLEASE INDICATE WHICH SUBSTANCES APPLIED IN STORES							
1.10		Post harvest processing activities are in compliance with the organic regulation. PLEASE EXPLAIN POST HARVEST ACTIVITIES							
1.11		Cleaning measures are in compliance with the organic regulation PLEASE EXPLAIN HOW YOU CLEAN PRODUCTS AND FACILITIES							
1.12		Cleaning agents used for stores, processing, transport tools are in compliance with the organic regulation PLEASE LIST CLEANING AGENTS USED							
1.13		Do you undertake precautionary measures to avoid from contamination							

Ref Nr	Reg. Nr	<p align="center">Organic Compliance Plan-Wild Collection</p> <p align="center">NOP 205.201, IACB 5.3, CAN/CGSB.7.6</p>	<p align="center">Producer Comments</p>	Doc Nr	GP 18 F 05
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C List of annexes: Indicate here which annexes you provide to ETKO related to your Organic Compliance Plan					
Annex No	Document name	YES	NO	NA	Comment
205.103(b)(3)	Do you maintain all records for at least five (5) years?				
Inputs	Purchase records for external ingredients are present?				
	Use of the external ingredients, date, place and quantity are present?				
Harvest 205.103(b)	Collection records for crops. Date, Place, Quantity are present?				
	In case of parallel/split collection, collection records of different standards, regulations and conventional crop harvest are present. (Date, Place, Quantity, etc).				
Sales	Sales records, invoices include date, quantity, product, status?				
Analyses	Product analyses reports are present?				
	Product specification is present?				
Documentation	Last inspection report and certificate (if the unit has been certified by other agencies) are present?				
205.103(a)	Are current organic certificates for all contracted handling operations (i.e. storage, cleaning facilities, etc.) maintained?				
	Labels for the products (for lose or closed products) in stock are present?				
	Collector agreement is present?				
205.201(a)(6)	Has an accurate map of the collection are been prepared? All surrounding land activity and buffer zones should be included on this map.				
ICS	Collectors List is present?				
	Collectors training records are available?				
	Consultant reports if any are present?				

D List of "NO" Answers: Indicate here your explanation for each NO answer	
Reference number	Explanation

E Summary of non-compliances Indicate here what Non conformities given during the last inspection and which corrective actions you took. 205.406			
Number	Non compliance	Corrective action	When will be fulfilled

Ref Nr	Reg. Nr	Organic Compliance Plan-Wild Collection NOP 205.201, IACB 5.3, CAN/CGSB.7.6	Producer Comments	Doc Nr	GP 18 F 05
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F Confirmation

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

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

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

During the past 3 years I as producer(s) declare that I did not apply any synthetic products which are not listed in organic regulations.

Place, date:

Signature of the representative:

Name of the representative:


G ETKO Results of verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		

Place, Date:

Name ETKO Representative

Signature of ETKO representative

	SURRENDER FORM NOP 205.404(c) and 205.406(a).	BELGE NO	GP 18 F 20
		TARİH	22.04.2016
		REV. NO	01
		SAYFA	1 / 1

Name of licensee/operator			
Licensee no		*Effective Date:	

***Effective Date cannot be in the past**

Complete this form if you no longer need certification for your **entire** operation or a **portion** of your operations such as a parcel, product, facility, etc. By surrendering the certification of your operation or portion of your operation, you are stating that you will **no longer represent it as organic** in any way. When your certification is surrendered, you are able to apply for certification in the future. For your convenience, electronic version of this form is available at ETKO website

A. What part of your operation do you no longer need certification for? *Choose one only:*

	Surrender covers following		Explanation
1	ENTIRE OPERATION	<input type="checkbox"/>	
2	ENTIRE PARCEL	<input type="checkbox"/>	
	Parcel Name or code		Material(s) applied
	Parcel Location		
3	PORTION OF A PARCEL	<input type="checkbox"/>	A detailed map showing borders and acreage remaining in the program is attached
	Parcel Name/ code		
	Parcel Location		
	Hectares withdrawn		Name certifier:
	Hectares remaining		
4	PRODUCT(S)	<input type="checkbox"/>	Describe which products, services, or brands you wish to withdraw. You may indicate which products you want to withdraw on your Client Profile and attach it
	Name products, services or brands		
5	FACILITY	<input type="checkbox"/>	If you are moving to a new location. New locations require an additional inspection
	Facility address		
	Products, services, or brands at this facility		

B-Reason Certification no longer needed

	No longer in operation	<input type="checkbox"/>	
	No longer produce or handle organic crops, livestock or products	<input type="checkbox"/>	
	Prohibited material application, date:	<input type="checkbox"/>	Material(s) applied
	Unhappy with ETKO service: why?	<input type="checkbox"/>	
	Certification costs	<input type="checkbox"/>	
	Deceased or ill	<input type="checkbox"/>	
	Paperwork	<input type="checkbox"/>	
	Certified by another USDA-NOP accredited certifier	<input type="checkbox"/>	Name certifier:
	Other; explain:	<input type="checkbox"/>	

Name responsible	Signature	Date

ETKO
Ecological Farming Control Organization

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

certifies that

XXXX

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

XX

XX

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

CROPS/WILD CROPS/HANDLING

Rise - 100% Organic

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

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

On Behalf of ETKO :
XXXXXXXXXX

ORGANIC CERTIFICATE



	NOP CERTIFICATION PROCEDURE -SUPPORT PROCEDURE FOR ORGANIC CERTIFICATION-	DOC.NR	GP 18
		DATE	07.07.2016
		REV. NR	04
		SAYFA	1/40




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
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PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

	NOP CERTIFICATION PROCEDURE -SUPPORT PROCEDURE FOR ORGANIC CERTIFICATION-	DOC.NR	GP 18
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1. Introduction

ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Sti prepared the certification procedure as a part of the Quality Management System in order to overcome the expectations and needs of the clients. The purpose of this procedure is to determine the methods for the certification scopes requested by the applicants for their products, starting from the first contact up to the certification decision taken.


After clients application is received an offer is made, after acceptance of the offer a contract is signed, following contracting phase evaluation is realized before certification decision is taken. In order to keep compliance with the certification rules subsequent surveillance Inspection are realized.

This procedure is updated in case of changes in the regulations of certification to keep compliance. The procedure could be updated incase program changes realized within the ETKO management system.

ETKO quality management system complying International Standard "EN ISO 17065" was prepared in order verifying compliance for the products applicants willing to apply for a specific standard or regulation. This procedure applies within the framework of the certification standard(s) applied for. EN ISO 17065 describes the requirements for the certification bodies for conformity assessment of the products.

ETKO prepares guides to inform applicants willing to apply for their products evaluation complying a certain standard within the accreditation scope.

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2. Approval and Quality Management:

ETKO top management undertakes full responsibility of the quality management system, therefor appoints a QMR Quality System Responsible who irrespective of other responsibilities, have responsibility and authority to ensure that processes and procedures needed for the management system are established, implemented and maintained.

ETKO Managing Director and Quality Management Responsible declares that the content of the Quality Manual is reviewed and it complies with the requirements of legal regulations.

3. Distribution List

Controlled copies of this QM are distributed to

1. Managing Director MD
2. Certifier
3. Quality Manager QM
4. Quality Manager Assistant QMA
5. Accreditation body AB

The original of Quality Manual is kept by QM.

The QM and QMA keep their QM copies in a safe place, enabling the access of inspectors or any other personnel, in need.


4. Purpose

This procedure defines the administrative aspects of application, evaluation and certification process for NOP National Organic Program.

5. Responsibilities

Managing Director, Quality manager, Certifier and Inspectors are responsible for the proper implementation of this procedure

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QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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6. Records and Reference Procedure:

Records related to Certification Procedure is listed in Document Master List “SP 01 F 03” section “FORMS”

Procedures implemented for application, evaluation, review, certification, surveillance and sanctions are listed in Document Master List “SP 01 F 03” section “PROCEDURES”

- GP 18 F 01 Organic Compliance Plan – process
- GP 18 F 02 Organic Compliance Plan – agricultural
- GP 18 F 05 Organic Compliance Plan - wild collection
- GP 18 F 06 Organic Compliance Plan – Feed Stuff Process
- GP 18 F 10 Notification of Noncompliance form (NONC)
- GP 18 F 11 Notification of Noncompliance Resolution (NONCR)
- GP 18 F 12A Notification of Denial of Certification Application Review (NODC)
- GP 18 F 12B Notification of Denial of Certification before Certification (NODC)
- GP 18 F 13 Notification of Proposed Suspension (NOPS)
- GP 18 F 14 Notification of Suspension (NOS)
- GP 18 F 15 Notification of Proposed Revocation (NOPR)
- GP 18 F 16 Notification of Revocation (NOR)
- GP 18 F 17 Reinstatement Request Letter From Suspended Operation to USDA
- GP 18 F 18 ETKO Reinstatement Request Letter for Suspended Operation to USDA
- GP 18 F 20 Surrender NOP Certification Letter

- GP 07 Fees procedure
- GP 11 Use of Logo and License,
- OP 03 Testing
- OP 10 OCP processing guidance
- OP 11 OCP agriculture guidance
- TI 05 Sampling Method
- TI 40 NOP Guide Testing & Enforcement Actions


7. Certification Requirements

7.1. General

ETKO operates under USDA Accreditation for NOP Regulation. The requirements against which the products of a client are evaluated according to NOP regulation.

The explanations required as to the application of these documents for NOP certification, are formulated by ETKO technical persons, possessing the necessary technical competence, and they are available to ETKO website www.etko.org.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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Applicants can download ETKO documents from the ETKO website www.etko.org and the NOP regulations from USDA website section National Organic Program: www.ams.usda.gov.

The designed objective of this certification process is to assure compliance to NOP requirements by developing a thorough understanding of the applicant and its operation. ETKO requires its clients to:

- Comply with all applicable NOP standards and requirements
- Establish, implement, and update annually an organic production or handling system plan;
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices;
- Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State official, and the certifying agent access to such records during normal business hours for review and copying to determine compliance with the regulations;
- Submit the applicable fees charged by the certifying agent; and
- Immediately notify the certifying agent concerning any:
 - application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
 - change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.
- All applicants, upon request for certification, will receive an application packet, which includes fee structures, a copy of the NOP Final Rules, required documentation and other information deemed pertinent to certification.


Applicant is required to provide all the documents, plan, records and information to ETKO to complete the application processes.

NOP regulation shall be used as standard in the inspection, in the application of accept/reject criteria, record keeping requirement. The inspector shall carry his/her own controlled copy of NOP regulation.

ETKO is responsible to provide NOP Regulation to its clients. In case, demanded NOP Regulation may be downloaded from the website. www.etko.org

Once the operator is certified the certificate stays valid unless it is cancelled, withdrawal or suspended by ETKO or AMS or surrendered by the operator.

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7.2. Application

Application process begins with the applicant providing all the information requested by the inspection information form (GP 01 F01) which must be initially completed by all those seeking certification. While this process is designed to be sufficiently thorough to secure the documentation necessary to verify the applicant's organic status, it is also designed to be relatively straightforward.

The primary purposes of the initial application are (1) to establish the applicant's eligibility, (2) define specific certification procedures, (3) estimate certification fees and (4) provide a reference for the independent ETKO inspector.

All applicants are required to complete the initial application process. Applicants are required to provide sufficient additional information to substantiate the baseline history of their organic status; including previous certification information where available.

The legal and statutory documents, related standards together with the certification procedures are sent to applicant by ETKO following the initial application of the client.

Applicants are encouraged to ask pertinent questions, which will enhance the ease, speed and accuracy of their application process

Upon receipt of the inspection information form (GP 01 F01), ETKO's staff performs a thorough review. The submitted information is initially screened to determine whether it meets the basic requirements for certification. Involved in this process is a comparison of the application information with applicable organic standards.

Under normal circumstances, the applicant will receive notification of its application status within 10 working days.

However, additional information, or correction of minor deficiencies may be required at this time. In such a circumstance, the application process is detained until sufficient information and documents are provided to develop an adequate level of confidence that proceeding with the certification is in the best mutual interest.

If the initial application is not accepted, the applicant is so notified with an explanation of those major deficiencies, which resulted in the rejection. In this case, the applicant is encouraged to correct the noted deficiencies and re-apply by submitting a new application

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7.2.1. Contract

If the initial application is accepted, ETKO offer containing a complete itemization of estimated fees is prepared for certification. Offer is to be approved by the applicant before the applicant is issued an application number, and a Contract (GP 01 F02). After the mutual approval of this contract the applicant is scheduled for the initial third party inspection.

Contract signed is valid until voluntary withdrawal, suspension or cancellation of the contract by ETKO or ministry of agriculture responsible bodies.

When the contract is signed, client is requested to submit the application package.

In case the initial application is under contract, then the applicant is requested to proceed to further phases, as instructed by ETKO.

7.2.2. Application Package


Clients must meet all applicable requirements of the National Organic Program when applying for certification. Each production or handling operation or portion of an operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold as “organic” **must** be certified and **must** meet all other applicable requirements of the National Organic Program.

7.2.2.1 Content of Application Package

Client together with the below mentioned documents submits to ETKO appropriate GP 18 F01 to GP 18 F 07 forms, duly filling.

- (a) An organic production or handling system plan, as required in §205.200;
- (b) The name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf;
- (c) The name(s) of any organic certifying agent(s) to which application has previously been made; the year(s) of application; the outcome of the application(s) submission, including, when available, a copy of any notification of noncompliance or denial of certification issued to the applicant for certification; and a description of the actions taken by the applicant to correct the noncompliance noted in the notification of noncompliance, including evidence of such correction; and
- (d) Other information necessary to determine compliance with the Act and the regulations

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- Applicant must have documented policies and procedures for excluding agricultural products from organic sale, if tests results are more than 5% of the EPA tolerance.

(Not: Applicant and ETKO will allow the applicable State official, or the AMS Administrator to conduct investigations to determine the cause of prohibited substances.)

7.2.2.2 Farming operations:

- production records from the three prior years for both the producer and for the hectare producing the crop seeking certification;
- detailed soil improvement plan as providing minimum soil tillage without leaving the fields unattended,
- pest management strategies for the crops being produced;
- A production plan including all details used to calculate estimated yields and production.

7.2.2.3 Processing and Handling Facilities:

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities are also required to undergo inspection and certification this package includes

- chain of custody documentation to verify inputs as being organically grown;
- details on the mechanics of the processing operation;
- Details on process management controls, including contamination prevention, pest management and sanitation's controls.

The application process is completed with the above mentioned information and documents supplied to the certification body.


Facilities dealing with processing activities described by NOP to be certified separately which cannot be certified as subcontractor under the umbrella organization. However there are operations involved with only storage and transport could be subcontracted and inspected under the certified operators. In this case organic system plan of the operator should include these operations activities. See more details TI 48 NOP Certification of Subcontracted Operations

7.3 Application Package Review

Application review is conducted by a competent person assigned by ETKO, who has the adequate technical knowledge and experience on general agriculture and organic agriculture.

Application review consists following:

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- A review to ensure that the application is complete as per ETKO procedures and other legal or statutory requirement.
- A determination of whether the applicant appears to comply or may be able to comply with the relevant applicable requirements of the production and handling standards;
- Verification that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any noncompliance's identified in the notification of noncompliance or denial of certification; and
- The scheduling of an on-site inspection of the operation to determine whether the applicant qualifies for certification if the review of application materials reveals that the production or handling operation may be in compliance with the applicable requirements.

Result of application package review is recorded on the application package review form (GP 02 F 01) and is sent to the client to take the remedial actions, if any. Any noncompliance observed is informed to the applicant, recorded on NONC (GP 18 F10)

Within a reasonable time, ETKO


- (1) Reviews the application materials received and communicate its findings to the applicant;
- (2) Provides the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed; and
- (3) Provides the applicant with a copy of the test results for any samples taken by an inspector.

Notes:

1. The applicant may withdraw its application at any time.
2. An applicant who withdraws its application is liable for the costs of services provided up to the time of withdrawal of its application.
3. An applicant that voluntarily withdrew its application prior to the issuance of a Notice of Noncompliance (NONC) (GP 18 F10) will not be issued a notice of noncompliance. Similarly, an applicant that voluntarily withdrew its application prior to the issuance of a Notification of Denial of Certification will not be issued a Notification of Denial of Certification

The client who completed the application phase is included on the inspection plan, and at all proceeding activities ETKO certification requirements and procedures are implemented.

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7.3.1 Organization of APPLICANT for Inspection

Prior to the scheduled inspection, the applicant is expected to have organized all of the records, which documents that, the commodities and / or processes under review are certifiable as organic. The applicant's co-operation in completing all of the forms, providing thorough and proper documentation, and being prepared, will greatly contribute to the timely and cost effective completion of the entire certification process. Delays to this process could lead, as a matter of course, to an increased cost (which would be borne by the applicant) of the overall certification.

While laws at the national level require the maintenance of these records, good business practice demands them. The applicant is reminded that documentation must be clear, complete and concise. Otherwise, an inspector may be unable to complete the inspection, as instructed, if sufficient information to verify the requisite status is not clearly provided. Unannounced inspections may be organized during the production and processing period to the applicant's agricultural production and processing units.

7.3.2 Ongoing Audit Monitoring of Records:

The program's comprehensive record keeping requirements, which direct a certified entity to maintain production input, and commodity tracking records on a current and continuing basis, provide Audit monitoring compliance.

Production inputs consist of anything that is instructed to, added to, or done in the process of creating a product. Commodity tracking consists of the mechanism by which anything that moves from the certified entity's operation into the distribution chain is quantitatively followed.


All of this information shall be maintained in an "auditable" form so that, should a full audit be required, information will be sufficiently presentable so as not to jeopardize the existing certification status which could result from un-audit ability of the record.

Applicants shall maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold as "organic", or "made with organic (specified ingredients)."

The client shall keep records according to the following procedure:

- Clients' records are adapted to the particular business that the certified operation is conducting;
- Clients' records fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;

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- Clients' records are maintained for not less than 5 years beyond their creation; and
- Clients' records are sufficient to demonstrate compliance with the regulations
- The client shall make its records available for inspection and copying during normal business hours by authorized representatives of the Secretary, State official, and ETKO.
- As well as applicants, ETKO maintains all records required by §205.510(b) and makes all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State official;

During the independent third party inspection, a thorough review of this record keeping system is performed to verify that they are being maintained in accordance with the terms and conditions of the program.

To facilitate the compliance with this requirement, the program's monitoring structure has the designed flexibility to accommodate a variety of independent reporting formats. Upon approval by ETKO, the applicant's existing record keeping system may be utilized. In this manner, the applicant is able to produce the required information in a familiar format while eliminating additional, redundant and unfamiliar form-filling efforts.

These record keeping requirements are fundamental to the overall certification process. For this reason, failure to maintain this necessary documentation can result in temporary suspension, or outright cancellation of certification until compliance is re-established.

If, in the judgment of ETKO, a full audit is deemed necessary, such would be performed by an ETKO designated accounting firm under terms and conditions specified in the Certification Agreement. Every effort would be made to schedule the audit as quickly as possible, and at a time of mutual convenience, to minimize delays in proceeding with full certification.


7.3.3 Time of the Essence

Both the applicant and ETKO have obligations to each other to assure that the certification process advances quickly and efficiently. The applicant is obliged to have its records in sufficient order to allow the preparation of a clear and concise application package, which, in turn, will enable the inspector to complete the inspection in a timely manner. Conversely, upon receipt of a properly prepared application, ETKO has an obligation to schedule, and subsequently complete, the certification process as quickly as practical.

7.3.4. Functions

Functions of the on site inspection are performed by ETKO qualified inspectors. Because these functions constitute a major source of information used in the development of a certification profile, only those individuals with extensive experience and requisite background are entrusted to perform these functions.

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Typical profile of an ETKO Inspector is explained in GP 16 Requirements for inspector qualification and necessary trainings in SP 05 Recruitment and Training procedures:

Inspectors use the formats as outlined in ETKO quality system, for recording and reporting. Inspectors are further instructed to follow specific instructions, answer all appropriate questions and provide a final report.

7.4. Evaluation

7.4.1 Aim of the Evaluation

Upon acceptance of the application, an onsite inspection is scheduled. ETKO inspectors perform a thorough evaluation of the application, and of the applicant's capacity to produce and/or process those commodities seeking certification.

The primary purpose of this inspection is to verify the accuracy and authenticity of the submitted application material. In addition, the inspection provides a two-way exchange of information, which is valuable to both the inspector and the applicant.

The inspector and the client need to be prepared to discuss the applicant's operating practices as they have been described in the application questionnaires.

The applicant shall provide to the inspector all of the farming and/or processing facilities which are contributory to the product(s) being certified. The inspector reviews all pertinent documentation, collects specified samples, records notes and takes photographs where appropriate. Unannounced inspections should be accepted.

ETKO conducts an initial on-site inspection of each production unit, facility, and site that is included in an operation for which certification is requested.


ETKO conducts an on-site inspection annually for each certified operation to determine whether to approve the request for certification or whether the certification of the operation should continue.

7.4.2. On Site Inspection

Inspections are conducted for NOP program with this procedure. Before performing an actual on site inspection, the inspector reviews

1. Technical instructions;
2. Related OPs and GPs

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3. Additional specific instructions and requirements of ETKO;
4. Legal and statutory documents and standards.
5. The application file
6. NOP Regulation.

Initial on-site inspection is conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the production and handling requirements. Initial inspection may be delayed for up to 6 months in order to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed.

All on-site inspections are conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the production and handling requirements can be observed.

This requirement does not apply to unannounced on-site inspections.

Inspection starts with the opening meeting in which the management team of the client attends. The scope of the certification (products, processes, standards, legal requirements...) are reviewed, information about the inspection method, inspection plan and reporting is provided.

The inspection involves recording observations of the entire operation in writing and on film when applicable. During the inspection, the inspector verifies the effectiveness and compliance of the operations, effecting the certification, to the certification requirements utilizing the relevant forms and questions as per relevant documents of ETKO:

- The operation's compliance or capability to comply with the appropriate relevant regulations;
- That the information, including the organic production or handling system plan, accurately reflects the practices used or to be used by the applicant or by the certified operation; and
- That prohibited substances have not been and are not being applied to the operation through means on which ETKO has the right to collect samples of soil, water, waste, seeds, plant tissue, and plant, animal, and processed products and test them at ETKO's expense.
- The projects containing several small farm holders may have an internal control system operating internal check of the producers to prepare them for certification. ICS operation needs to be checked by the inspector according to OP 01 Inspection Procedure art. 22 and OP 02 Grower Groups Procedure.

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For on-site inspections of farming operations, the inspector is required to walk through the applicant's operation to evaluate the farming practices. The farm applicant is required to make available to the inspector all of the farming records and facilities, which are contributory to the commodity being certified. This would include the farm itself, adjacent areas, ancillary facilities and equipment such as storage areas, tractors and other farming implements.

For on-site inspections of processing facilities, the inspector is required to evaluate the process flow as described on the applicant's flow chart. This is accomplished by observing the equipment being used, major process control points, all ingredients added to the processed product, pest control management systems, and all ingredients used in the maintenance and/or cleaning of the process equipment; and disposal of waste and other production process by-products.

The inspector will conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector addresses the need for any additional information as well as any issues of concern.

Outdated documents are withdrawn from the service after 10 years. ETKO guarantees that all valid documents are at hand to all respective users during this period.

ETKO may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the regulations...

The additional inspections may be announced or unannounced at the discretion of ETKO or as required by the AMS Administrator or State official.

7.4.3. Laboratory Testing

ETKO requires operators realize testing at a minimum is required annually. At the discretion of ETKO, additional testing may be performed by ETKO on a regular basis throughout the certification period. For the compliance of NOP regulation 205.670-672 ETKO procedures TI 05 Sampling Method and TI 40 NOP Guide Testing & Enforcement Actions are implemented.

Samples taken at the time of the initial inspection, or annual renewal, provide the initial basis for analytical enforcement. Unannounced sampling and testing may be also performed on both random surveillance bases as well as on a compliance basis.

Both routine and unannounced additional sampling and testing are at ETKO's expense when ETKO decide to make analyses.

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7.4.4. Production Inputs and Commodity Tracking System

Every certified entity, be it a grower, shipper, processor, handler or distributor, is required to collect and maintain records on all activities, materials and changes that take place within its operation. Information regarding all inputs and all physical production is required. In addition, information regarding the movement of finished product is required.

ETKO retains the option review all input and production records at any time.

The inspector must be sure that:

- the record keeping system is continuously maintained in an “auditable” format, and
- it is sufficiently comprehensive to provide all of the required information, and yet
- it is concise enough to provide unambiguous audit trail.

ETKO endeavors to utilize the applicant’s established record keeping systems. All such systems must receive ETKO approval, and must be reviewed by inspector before certification may be granted.

7.4.5. Audit Report

All the observations and findings during audit are recorded on inspection reports and other related records as appropriate as required by certification process. The observations and findings in relation to the deviation from the rules, regulations are to be recorded under “Evaluation Results”

The inspectors have no authority to define a noncompliance either in inspection report or in any other record, or inform the client with such an information stating indicating a noncompliance.

At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector.


A copy of the Inspection Report and any test results are sent to the client .

Note: providing advice for corrective actions is strictly prohibited by accreditation rules.

7.4.6. Surveillance

ETKO performs periodical inspections (surveillance visits) on the client’s premises/processes in order to see and verify if the products and or processes in the certification scope,

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maintains conformance to the relevant standards, statutory and legal requirements. The period for surveillance is determined during the initial inspection, if possible and included in the contract.

The scope of surveillance visits is determined during the inspection by the inspectors.

During the overall process of certification and during maintenance of the certificate, the inspector ensures that the applicant is always reminded to keep and maintain relevant records of its activities properly, in an auditable manner.

The applicant may continue to use its existing record and record keeping system, if it is found to be satisfactory by ETKO. Otherwise it is requested to improve recording and filing system.

The applicant is required to keep and maintain production input, and commodity tracking records on a continuing basis to provide as an evidence of compliance of certification requirements.

Production inputs consist of anything that is instructed to, added to, or done in the process of creating a product. Commodity tracking consists of the mechanism by which anything that moves from the certified entity's operation into the distribution chain is quantitatively followed.

All of this information must be maintained in an "auditable" form so that, should a full audit be required, information will be sufficiently presentable so as not to jeopardize the existing certification status which could result from un-audit ability of the record.

Applicants maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold as "organic", or "made with organic (specified ingredients).

7.4.7. Records:

- fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
- are maintained for not less than 5 years beyond their creation;
- must be sufficient to demonstrate compliance with the regulations
- Regular reporting of specific information, as dictated by the nature of the certified operation, is required from certified clients on an individualized basis.
- When required; at the discretion of ETKO additional testing may be performed on a regular basis throughout the certification period.

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Samples collected in the initial inspection or during surveillance provide fundamental information for the decision on certification. During the certification period sampling and testes may be done without informing the client. During the inspection, a thorough review of this record keeping system is performed to verify that they are being maintained in accordance with the terms and conditions of the program.

The record keeping requirements are fundamental to the overall certification process. For this reason, failure to maintain this necessary documentation can result in temporary suspension, or outright cancellation of certification until compliance is re-established.

If, in the judgment of ETKO, a financial audit is deemed necessary, such would be performed by an ETKO designated accounting firm under terms and conditions specified in the Certification Agreement. Every effort would be made to schedule the audit as quickly as possible, and at a time of mutual convenience, to minimize delays in proceeding with full certification.

Customer complaints records and actions taken for complaints by the client are also subject to inspection to verify that the client takes proper and effective action.

7.4.8. Continuing Support

ETKO, in providing certification, is making a commitment to support the organic integrity of its clients on an on going basis. ETKO is responsible to provide NOP Regulation and the amendments in the original language of the rule.

The changes of the certification system especially in case of changes of the certification requirements will be forwarded to the licensees.

ETKO has the right to insight the necessary documents regarding the application of new requirements.

ETKO provides relevant regulations and standards and the amendments to its clients in their language.

The clients are informed on a timely manner, about the amendments in the certification system and the changes in the certification requirements formally in written form or by publishing in website. The amendments are valid on the date as informed to the client. The client is responsible to implement the changes in the requirements as soon as received. ETKO controls the effective implementation of the changes in requirements by the client.

The clients are responsible to inform ETKO about the planned changes in their processes, on time. ETKO shall not be responsible of the results due to the late notification of the client

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about the changes. The changes in the client's system have to be inspected and approved prior to the implementation. The inspection is done on site and on the related documents

The changes to be made by the client have to be not affecting the organic status of the current production. The planned changes are strictly required to be in accordance with relevant legal requirements and standards. Otherwise, ETKO may deny the change and its consequences, and may postpone or cancel the certification of the product (ion) effected by the change.

7.4.9. Ongoing Compliance

For NOP, the ongoing compliance is enforced by a series of different check systems applied in surveillances.

- **Production input records**

Required by the program, they shall be maintained on a current and continuous basis. These records must be available for inspection; and they also may be required as part of regular reporting requirements.

- **Commodity-tracking systems**

They are routinely monitored in the market place by random checking. This mechanism enables ETKO to audit the flow of certified product through the channels of distribution on a real time basis.

- **Audits of record keeping systems**

It is routinely performed during an inspection, also can be required at any time during the certification period. In addition, routine auditing of regularly reported information is performed.


- **Regular reporting of specific information**

As dictated by the nature of the certified operation, it is required from certified clients on an individualized basis.

7.4.10. Temporary variances

Clients are allowed to receive temporary variances from the requirements in production and handling standards as established by the regulations for the following reasons:

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- Natural disaster declared by the Secretary.
- Damage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire, or other business interruption.
- Practices used for the purpose of conducting research or trials of techniques, varieties, or ingredients used in organic production or handling.

ETKO will notify USDA to recommend a temporary variance from a production or handling standard, provided that the variance is based on one or more of the reasons listed above.

ETKO will notify each applicant of the establishment of a temporary variance for each production and handling operation it certifies to which that temporary variance applies.

7.4.11. Acceptable and Prohibited Materials

The general criteria used by ETKO for determining the acceptability of a material is specified by the USDA National Organic Program's National List of Approved and Prohibited Substances.

Basic policy maintains that non-synthetically compounded materials, a group generally referred to as biological agricultural products, tend to be acceptable. Conversely, the use of synthetically compounded materials, genetically modified propagation materials, processing aids and plant protection materials, such as genetically modified parasites, predator and other organisms almost without exception, are prohibited.


In addition, those materials, which, while may not be synthetically compounded, but continue to be either highly toxic or environmentally hazardous, are similarly prohibited.

The agricultural products sold by certified clients as organic are produced and handled:

- In compliance with the National List;
- Without the use of excluded methods, except for vaccines, provided that the vaccines are approved;
- Without the use of ionizing radiation; and
- Without the use of sewage sludge.

Clients are required to verify the acceptability of inputs with ETKO prior to their use in order to avoid inadvertently jeopardizing an organic status through the use of a prohibited material.

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7.4.12. Transition Period

The setting of a fixed transitional time period may be considered arbitrary; however, benchmarks are necessary. To enter into the ETKO certification program, the minimum amount of time that an applicant's crop and cropping areas must be operated under conditions which have had no unacceptable materials applied is dictated by those regulations, which prevail over its certification.

The organic foods industry has been developing a consensus of three years as the recognized minimum acceptable period by the USDA National Legislation; NOP Regulation .

Measurement of the minimum period is determined as follows:

- Annual crops: period prior to seed planting or transplanting.
- Perennial crops: period prior to the appearance of flower buds.

7.4.13. Packaging and Post-Harvest Handling

No commodity can be considered legitimately organic unless it is organic from its field origin to the marketplace. For this reason, the importance of proper packaging and post harvest handling is equal to that of the actual field production.

7.4.14. Processing

No unacceptable materials may be used in the cleaning, packaging or storing of a certifiable product once it has been harvested. This condition applies equally regardless of whether the applicant handles all of the post harvest, or subcontracts it to another entity.

The responsible authority for these activities will be required to complete an application and affidavit regarding post-harvesting operations. Failure to properly complete this portion of the certification process could be cause for denial of certification. Special forms to complete this portion of the process are available from ETKO upon request.

7.4.15. Setting the Fee

The fee structure is generically designed to be applicable to a large number of different agricultural and processing operations. However, because these operations are so diverse, it is virtually impossible to structure a schedule, which anticipates every variation.

Therefore, prior to the acceptance of an application, ETKO will determine what, if any, additional changes will be required to the basic fee structure. These changes will be

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presented, in detail, to the applicant who will have the opportunity to approve the changes, modify the application, or withdraw it entirely.

The applicant's decision is then formalized in writing and incorporated as part of the Certification Agreement, which is included with the transmittal accepting the application.

7.4.16 Propagation Material Non-commercially Available

Operators or producers certified by ETKO must apply with the "Propagation Material Approval Form" to ETKO for approval of a non-commercially available organic propagation material before use in organic production.

Applicant should prove that there is no source available by documents. ETKO checks possible sources which can provide the propagation material through National List from the statistics of the origin country Ministry of Agriculture.

ETKO Certified operations and producers are obliged to follow the NOP Regulation 205.204 Seeds and Planting Stocks Practice Standard and ETKO procedures mentioned on 5.17 of this procedure.

7.4.17 Ingredients Non-commercially Available

ETKO Certified operations and producers are obliged to follow the NOP Regulation 205.105 "Allowed and prohibited substances, methods, and ingredients in organic production and handling",
 205.270 Organic Handling Requirements,
 205.301 Product Composition,
 205.606 Non-organically produced agricultural products allowed as ingredients in or on processed products labeled as organic or made with organic ingredients.


7.5. Granting Certification

7.5.1. Certification Decision

The Organic Certifier is responsible for all the decisions in relation to certification (granting, suspension, revoking...) The OC is independent of the application review and or certification process.

Granting the certificate depends on the appropriate planning or, planning and implementation of the corrective actions in a timely manner for the Notification of

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Noncompliance “GP 18 F 10” reported by the OC to client, based on the inspection reports and all other supporting documents and evidences.

Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by ETKO or the State organic program's governing State official, or the Administrator.

ETKO Organic Certifier grants certification based on the determination that:

- The applicant is in compliance with its organic system plan and all procedures;
- The activities of the applicant’s operation are in compliance with the appropriate regulations; and
- The applicant is able to conduct operations in accordance with the plan

7.5.2. Certification Certificate


Within a reasonable time after completion of the initial on-site inspection, the Organic Certifier (OC) reviews the on-site inspection report, the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant. If the organic system plan and all procedures and activities of the applicant's operation are in compliance with the certification requirements and that the applicant is able to conduct operations in accordance with the plan, the OC grants certification. (GP 13 F 03 NOP certificate)

The certification may include requirements for the correction of minor non compliances within a specified time period as a condition of continued certification. (See art.5.24)

The certificate of organic operation specifies the:

- (1) Name and address of the certified operation; including a physical address if the mailing or legal address is not the physical location of the operation
- (2) Name, address, Website, 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) Issue date (when ETKO issued the organic certificate);
- (5) Anniversary date (when the certified operation must submit its annual update).
Organic certificates cannot include expiration dates;
- (6) Categories of organic operation, including crops, wild crops, livestock, and handling/processing)

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(7) Specific certified organic products covered by the organic certificate, allowing auditors and buyers to verify whether the operation is certified to produce or handle the product for sale (e.g., “hay” or “Uncle Perry’s Berry Organic Granola”);

(8) 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);

(9) The statement, “Certified to the USDA organic regulations, 7 CFR Part 205.” This differentiates USDA organic products from those certified to other organic standards; and

(10) The statement, “Once certified, a production or handling operation’s organic certification continues in effect until surrendered, suspended or revoked.”

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

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- 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:

- Correct noncompliance and submit a description of the corrective actions taken with supporting documentation to ETKO; or
- 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
- 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:


- 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"
- 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

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- 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 Non compliance.

To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to ETKO:

1. An updated organic production or handling system plan which includes:
 - a. A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year; and
 - b. Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, related to production practices

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- Any additions to or deletions from the information related to address, responsible person, name of the company, telephone number given to ETKO for certification.
- An update on the correction of minor noncompliance previously identified by ETKO as requiring correction for continued certification; and
- 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:

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- 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:

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- Prove that ingredients identified as organic were organically grown, and
- Verify quantities produced from organic ingredients

Records shall be available to representatives of the Secretary and State officials.

7.5.7. Compliance and Handling of Noncompliance

ETKO will handle noncompliance's according to:

- NOP 4002 Instruction Enforcement of the USDA Organic Regulations Penalty Matrix and
- NOP Instruction 2612 Recommended Penalties for Violations of Specific Regulatory Requirements and NOP 2612-1 Penalty Matrix for violations of the USDA Organic Regulations

NOP 4002 provides instructions for taking enforcement action against certified operations that violate the U.S. Department of Agriculture (USDA) organic regulations.

NOP 2612-1 Penalty Matrix for violations of the USDA Organic Regulations, provides guidance about recommended penalties for violation classes and categories.

7.5.8. Review and Investigations

NOP Program Manager, on behalf of the Secretary, may inspect and review certified production and handling operations and accredited certifying agents for compliance with the Act or regulations.

The Program Manager may initiate suspension or revocation proceedings against a certified operation when the Program Manager has reason to believe that a certified operation has violated or is not in compliance with the Act or regulations or when a certifying agent or a State organic program's governing State official fails to take appropriate action to enforce the Act or regulations.

ETKO may investigate complaints of noncompliance with the Act or regulations concerning production and handling operations certified as organic. Program Manager is informed of all compliance proceedings and actions taken.

A State organic program's governing State official may investigate complaints of noncompliance with the Act or regulations, concerning organic production or handling operations operating in the State.

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:

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- 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.

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- o Annual updates not provided
- o Several minor interrelated noncompliance can lead to a major noncompliance.

- **Minor non-conformances**

- o Failure to fully satisfy a requirement of a standard or regulation.
- o 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)

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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)

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(2) ETKO will not send a notification of suspension or revocation to a certified operation that has requested mediation pursuant to §205.663 or filed an appeal pursuant to §205.681, while final resolution of either is pending.

In case of suspension, the certified operation is no longer certified and must go through the reinstatement process. Therefore certified operation is not able to sell, label, and represent the product as organic for the suspension period. Once suspended, reinstatement for certification may only be requested from the Administrator and will only be considered for certification if the Notification of Noncompliance (GP 18 F 10) is corrected and the operation has been inspected by ETKO to verify that the operation complies with the requirements.

7.5.10. Willful violations

- If there is reason to believe that a certified operation has willfully violated the Act or regulations, ETKO sends the certified operation a **Notification of Proposed Suspension or Revocation** GP 18 F 13 or GP 18 F 15 of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

7.5.11. Violations of Act.

In addition to suspension or revocation, any certified operation that:

- knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in §3.91(b)(1) of this title” per violation.
- 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

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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, AIAMBox@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

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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

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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.


- 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:

- Review the request for reinstatement along with the supporting documentation. Contact the certifying agent if questions remain regarding the request.
- 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.
- 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:
 - The operation is eligible for reinstatement by the certifying agent referenced in the request, and
 - ETKO retains all documents related to the reinstatement for future audit by the NOP.
 -
- If the request is denied, issues a letter to the operation, with a copy to ETKO, stating the reasons for denying reinstatement.
- Review all documentation related to the reinstatement at ETKO's next onsite audit.

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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.

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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

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unsuccessful, the applicant for certification or client shall have 30 days from termination of mediation to appeal the ETKO's decision.

Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and NOP regulations. The Secretary may review any mediated agreement for conformity to the Act and NOP regulations and may reject any agreement or provision not in conformance with the Act or NOP regulations.

7.5.16. Use Of Logo, Licenses, Mark Of Conformity

See procedure GP 11 Use Of Logo, Licenses, Mark Of Conformity

7.5.17. Criteria for Certification File Review

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NOP CERTIFICATION PROCEDURE

 -SUPPORT PROCEDURE FOR ORGANIC

 CERTIFICATION-

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DEFECTS	DEFECT CODE	DECISION
GROUP A- CERTIFICATION RECOMMENDATION		
Company/Client name is clearly recorded	A2	NO GO
The licensee number is recorded	A3	NO GO
The address of client/site is recorded	A4	NO GO
Type of certification is specified	A5	NO GO
The related standards and regulations are clearly specified	A6	NO GO
The scope is clearly recorded	A7	NO GO
GROUP B		
The info provided about identity and regulations are correct	B2	NO GO
Inspection dates	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 – INSP. 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


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	Assessment Product specification Ürün Spesifikasyonu Değerlendirilmesi For multi ingredient products only	BELGE NO	OP 01 F 14
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Referring to your letter/fax message of Mektup-Fax mesajına istinaden		Date:	
Name and number of licensee Müşahhah isim ve lisans numarası			
Fax number, Fax numarası			
Authorized person, Yetkili kiři			
Name of product(s), Ürünlerin isimleri			
Assessed by, Değerlendiren kiři			
Product code, Ürünün kod numarası			
Assessed by – Formu değerlendiren		Signature	

No	Issues - Konular	Complies-Uygundur	
1	Product specification complete and clear - Ürün spesifikasyonu açık ve tamdır	YES <input type="checkbox"/>	NO <input type="checkbox"/>
2	Name and number licensee are corresponding (box 2 & 3), Müşahhah isim ve lisans numarası doğrudur (kutu 2& 3)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
3	Original product certificate present (not applicable if first product), Orjinal ürün sertifikası mevcuttur (şayet ilk ürün ise uygulanamaz)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
4	Non-organic agricultural ingredients listed on Organic Regulations (box 6c), If not, concerns, Organik Tarım Yönetmeliklerinde belirtilen yardımcı maddeler işaretlenmiş (kutu 6c), Şayet değilse, ilgilidir	YES <input type="checkbox"/>	NO <input type="checkbox"/>
5	Indicated non-agricultural ingredients and technical aids listed on Organic Regulations (box 6d/6e), If not, concerns: Organik Tarım yönetmeliklerinde listelenmiş olan ve tarımsal olmayan içerik ve yardımcı maddeler	YES <input type="checkbox"/>	NO <input type="checkbox"/>
6	Percentage of weight correctly calculated and corresponds with product category (box 4b/7), Yüzdelere ve ağırlıklar doğru hesaplanmış ve ürün kategorisine uygundur (kutu 4b/7)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
7	All processing steps mentioned (box 9a), Bütün işleme adımları belirtilmiş (kutu 9a)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
8	Name, place production unit mentioned (box 9b), İşletmenin adı, adresi belirtilmiş (kutu 9b)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
9	In case process inspected by ETKO process-certificate number indicated otherwise, Şayet ETKO tarafından sertifikalandırılmış ise işletme sertifika numarası belirtilmiş	YES <input type="checkbox"/>	NO <input type="checkbox"/>
10	Name approved inspection body (box 9c), Kontrol kuruluşunun ismi (kutu 9c)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
11	Date and signature present (box 10), Tarih ve imza mevcut	YES <input type="checkbox"/>	NO <input type="checkbox"/>
12	Total correct, Toplam doğrudur	YES <input type="checkbox"/>	NO <input type="checkbox"/>
13	Please send product specification again after adaptation, Lütfen ürün spesifikasyonunu düzelttikten sonra tekrar gönderin	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	Comments, Açıklama		

* For product category **organic and 100 % organic** (other categories are assessed case by case) Sadece **organik ve % 100 organik** olan ürün kategorileri için geçerlidir (diğer kategoriler ayrıyeten ve tek tek değerlendirilir)

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Name of licensee/company			
Licensee no		Date application	
Name of product(s)			
Form Prepared by			

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

APPLICANT SECTION

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

SUBPART D Labels, Labeling, and Market Information


§205.301 Product composition.

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

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


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

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


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Applicant Section & ETKO Verification

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

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number of the certifying agent may be included in such label.		
(c) Agricultural products in packages described in §205.301(c) must not display the USDA seal.		
§205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(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.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Livestock feed products described in §205.301(e)(1) and (e)(2) may display on any package panel the following terms:		
(1) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feed product;		
(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 distributor of the product and preceded by the statement, "Certified organic by * * *," or similar phrase, display the name of the certifying agent that certified the handler of the finished product. The business address, Internet address, or telephone number of the certifying agent may be included in such label.		
(2) Comply with other Federal agency or State feed labeling requirements as applicable.		
§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:		
(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;		
(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	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

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"organic."		
(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 retail sale that are sold, labeled, or represented as "made with organic (specified ingredients or food group(s))."	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Agricultural products in other than packaged form containing between 70 and 95 percent organically produced ingredients may use the phrase, "made with organic (specified ingredients or food group(s))," to modify the name of the product in retail display, labeling, and display containers.		
(1) Such statement must not list more than three organic ingredients or food groups, and		
(2) In any such display of the product's ingredient statement, the organic ingredients are identified as "organic."		
(b) If prepared in a certified facility, such agricultural products labeled as "made with organic (specified ingredients or food group(s))" in retail displays, display containers, and market information may display the certifying agent's seal, logo, or other identifying mark.		
§205.310 Agricultural products produced on an exempt or excluded operation.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) An agricultural product organically produced or handled on an exempt or excluded operation must not:		
(1) Display the USDA seal or any certifying agent's seal or other identifying mark which represents the exempt or excluded operation as a certified organic operation, or		
(2) Be represented as a certified organic product or certified organic ingredient to any buyer.		
(b) An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient in a multi-ingredient product produced by the exempt or excluded operation. Such product or ingredient must not be identified or represented as "organic" in a product processed by others.		
(c) Such product is subject to requirements specified in paragraph (a) of §205.300, and paragraphs (f)(1) through (f)(7) of §205.301.		
§205.311 USDA Seal.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) The USDA seal described in paragraphs (b) and (c) of this section may be used only for raw or processed agricultural products described in paragraphs (a), (b), (e)(1), and (e)(2) of §205.301.		
(b) The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously:		
(1) On a white background with a brown outer circle and with the term, "USDA," in green overlaying a white upper semicircle and with the term, "organic," in white overlaying the green lower half circle; or		
(2) On a white or transparent background with black outer circle and black "USDA" on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.		
(3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.		

ETKO APPROVAL (This section is ETKO use only)

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

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NA: Not Applicable, NCR: Non conformity, MA: Major, MI: Minor, PoA: Point of Attention

Organic Compliance Plan-Grower Group QMS

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

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

NCR Non-Conformity Level (MA/MI/PoA) section will be filled in by ETKO inspector. MA: Major, MI: Minor, PoA: Point of Attention

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

GGO: Grower Group Organization

NAME LICENSE HOLDER				
NAME Grower Group Organization				
ADDRESS				
COUNTRY				
PHONE-FAX-EMAIL				
CONTACT PERSON				
APPLICABLE REGULATIONS	<input type="checkbox"/> TC Regulation	<input type="checkbox"/> NOP Regulation	<input type="checkbox"/> Equivalent EC Regulation	<input type="checkbox"/> Other

Note: Under NOP Final rule section 205.400 indicates that it is a “person” who seeks organic certification, it can be concluded that grower groups, organized as cooperatives or associations, can seek certification as one operation under the NOP Grower groups are different from other entities seeking certification in that they are comprised of numerous producers who are certified as one entity, rather than being certified as individual sole proprietors.

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1	Verifying that the operator is a grower groups organization		
1.1	Is the GGO members farming operations are uniform in most ways and organized Under one management and marketing system? EXPLAIN THE PRODUCTION AND UNIFORMITY OF FARMING SYSTEM		
1.2	Is the GGO a farmers cooperative or farmers union or a structured group of producers affiliated to a processor or an exporter ? INDICATE GGO IS A COOPERATIVE, FARMERS UNION or OTHER		
1.3	Is the marketing done collectively? EXPLAIN HOW THE MARKETING ORGANIZED		
1.4	There is not any farm covers more then 20 hectars of land? INDICATE THE PERCENTAGE OF THE FARMS HAVING MORE THEN 20 HA OF LAND		
	Grower Group Quality Management System		
2.1	Administration and Structure		
2.1.1	Legality		
2.1.1	Is there documentation, which clearly demonstrates that the applicant Grower Group is a legal entity? ATTACH THE REGISTRATION DOCUMENT OF THE GGO		
2.1.2	Structure		
2.1.2	Is the administrative structure of the Grower Group documented and does it clearly identify the relationship between the Farms/Growers and the Grower Group? INDICATE THE STRUCTURE of GGO		
2.1.3	Contractual Documentation		
2.1.3	Is there written signed contracts between each Grower/Farm and the Grower Group? ATTACH A CONTRACT SIGNED BY THE GGO AND THE PRODUCER		
2.1.3.i	Does the contract include the Name or fiscal identification of the Grower/Farm?		
2.1.3.ii	Does the contract include the Contact address?		
2.1.3.iii	Does the contract include the Individual farm location?		
2.1.3.iv	Does the contract include Commitment to comply with the requirements of the Organic Farming Regulations? INDICATE HOW IS IT COMMITTED		

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2.1.3.v	Does the contract include an Agreement to comply with the Grower Group documented procedures, policies and where provided, technical advice? INDICATE HOW IS IT FORMULATED IN THE CONTRACT					
2.1.3.vi	Does the contract include the Sanctions, which may be applied in case of Organic Farming Regulations requirements not being met? INDICATE HOW SANCTIONS ARE MENTIONED					
2.1.4	Grower Register					
2.1.4	Is there a register maintained of all Organic Farming Regulations Growers/Farms included within the Grower Group scheme and all Produce Handling/applicable production sites used for produce/product grown in accordance with the Organic Farming Regulations? INDICATE WHAT KIND OF REGISTER IS KEPT FOR FARMING AND PROCESSING					
2.1.4.i	Does the register contain the Name or fiscal identification of the Grower/Farm and Produce Handling Site (where applicable)? ATTACH YOUR GROWER REGISTER					
2.1.4.ii	Does the register contain the Contact address? INDICATE THE ADDRESS IN REGISTER					
2.1.4.iii	Does the register contain the Individual farm and Produce Handling site (where applicable) location? INDICATE THE ADDRESSES					
2.1.4.iv	Does the register contain the Registered product (species/subspecies) grown and handled at the Produce Handling sites or registered production sites? INDICATE REGISTERED PRODUCTS					
2.1.4.v	Does the register contain the Growing/rearing area for each registered product? INDICATE THE HECTARS FOR EACH CROP/PRODUCT					
2.1.4.vi	Does the register contain the Internal audit date? INDICATE THE INTERNAL AUDIT DATE					
2.1.4.vii	Does the register contain the Current Organic Farming Regulations status? INDICATE WHICH PRODUCER WILL BE CERTIFIED ACCORDING TO WHICH REGULATIONS					
2.2	Management and Organisation					
2.2.1	Structure					
2.2.1	Does the Grower Group have a management structure and sufficient suitably trained resources to effectively ensure that the registered farms meet the requirements of Organic Farming Regulations? INDICATE THE MANAGEMENT OF THE GGO AND LIST THE TRAINED STUFF					

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2.2.1.i	Is organisational structure of the Grower group documented and does it include the Organic Farming Regulations Management Representative? INDICATE THE ORGANIZATIONAL STRUCTURE OF THE GGO, INDICATE THE NAME OF THE RESPONSIBLE					
2.2.1.ii	Does it include the Internal Audit Department / Person? INDICATE THE NAME OF THE RESPONSIBLE					
2.2.1.iii	Does it include an Agricultural/Livestock Technical Department / Person? INDICATE THE NAME OF THE PERSON					
2.2.1.iv	Does it include a Quality Systems Management? INDICATE THE NAME OF THE RESPONSIBLE					
2.2.1.v	Does it include a Produce Handling site Management (if applicable)? INDICATE THE NAME OF THE RESPONSIBLE					
2.2.2	Responsibilities and Duties					
2.2.2	Are the duties and responsibilities of all personnel involved with the Organic Farming Regulations Quality system documented, and is there a nominated individual with sufficient seniority and resources with overall responsibility for maintenance of the Organic Farming Regulations system? ATTACH THE QUALITY MANAGEMENT SYSTEM (QMS) DOCUMENTS					
2.3	Competence and Training of Staff					
2.3.1	Does the Grower Group ensure that all personnel with responsibility for compliance with the Organic Farming Regulations are adequately trained and meet the defined competency requirements? EXPLAIN THE TRAINING PROGRAM FOR THE RESPONSIBLE PERSONNEL					
2.3.2	Are the competency requirements, training and qualifications for key staff documented and does it meet any defined competency requirements? INDICATE YOUR COMPETENCY REQUIREMENTS FOR THE KEY STUFF					
2.3.3	Are records of qualifications and training maintained for all key staff to demonstrate competence? INDICATE WHICH RECORDS ARE KEPT TO DEMONSTRATE COMPETENCE					
2.3.4	Where more than one internal auditor is used, is there a program of training and evaluation of the internal auditors (e.g. by shadow audits) to ensure consistency of standards and approach? INDICATE THE PROGRAM FOR TRAINING AND EVALUATION OF THE INTERNAL AUDITORS					

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2.3.5	Is there a system in place to demonstrate that key staff is informed and is aware of developments, issues and legislative changes relevant to the operation of the Organic Farming Regulations? INDICATE HOW YOU INFORM THE KEY STUFF FOR THE DEVELOPMENTS					
2.4	Quality Manual					
2.4.1	Are the operating and quality management systems related to the Organic Farming Regulations documented and contained in a Quality Manual(s)? ATTACH QUALITY MANUAL					
2.4.2	Are the policies and procedures sufficiently detailed to demonstrate the Grower Group's control of the principal requirements of the Organic Farming Regulations? ATTACH POLICIES AND PROCEDURES					
2.4.3	Are the relevant procedures and policies available to registered members and key staff? INDICATE THE PROCEDURE AND POLICY TO REGISTER NEW MEMBERS					
2.4.4	Is the content of the Quality Manual reviewed periodically to ensure that it continues to meet the requirements of the Organic Farming Regulations and the Grower Group? INDICATE HOW OFTEN QUALITY MANUAL IS REVIEWED					
2.5	Document Control					
2.5.1	Quality Management System Documents					
2.5.1.i	Do all documentation relevant to the operation of the Quality Management System for Organic Farming Regulations exist and are they adequately controlled, including the Quality Manual? INDICATE WHICH REGULATIONS YOUR SYSTEM COVERS and EXPLAIN HOW OFTEN IS THE INTERNAL AUDIT REALISED					
2.5.1.ii	Do all the documentation relevant to the operation of the Quality Management System for Organic Farming Regulations exist and are they adequately controlled, including the Organic Farming Regulations Operating procedures? NAME THE OPERATING PROCEDURES FOR ORGANIC REGULATIONS					
2.5.1.iii	Do all the documentation relevant to the operation of the Quality Management System for Organic Farming Regulations exist and are they adequately controlled, including Work instructions? LIST THE DOCUMENTS YOU USE FOR QMS INCLUDING WORK INSTRUCTIONS					
2.5.1.iv	Do all the documentation relevant to the operation of the Quality Management System for Organic Farming Regulations exist and are they adequately controlled, including recording forms? LIST THE FORMS YOU USE					

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2.5.1.v	Do all the documentation relevant to the operation of the Quality Management System for Organic Farming Regulations exist and are they adequately controlled, including external standards, e.g. the Organic Farming Regulations? LIST THE REGULATIONS RELATED TO YOUR QMS					
2.5.2	Quality Management System document control requirements					
2.5.2.i	Is there a written procedure defining the control of documents? HOW DO YOU CONTROL DOCUMENTS					
2.5.2.ii	Are all documentation reviewed and approved by authorized personnel before issue and distribution? NAME THE AUTHORIZED PERSON FOR REVIEW AND APPROVAL					
2.5.2.iii	Are all controlled documents identified with an issue number, issue date/ review date and appropriately paged? HOW DO YOU KEEP LIST OF THE CONTROLLED DOCUMENTS					
2.5.2.iv	Is any change in these documents reviewed and approved by authorized personnel prior to its distribution? Wherever possible, is the explanation of the reason and the nature of the changes identified? EXPLAIN HOW YOU APPROVE AND DISTRIBUTE DOCUMENTS					
2.5.2.v	Is a copy of all relevant documentation available at all places where the Quality Management System is being controlled? HOW DO YOU KEEP COPIES and WHERE,					
2.5.2.vi	Is there a system that ensures that documentation is reviewed and that following the issue of new documents, obsolete documents are effectively rescinded? HOW DO YOU INDICATE REVIEWED DOCUMENTS AND WHAT YOU DO OBSOLETE DOCUMENTS					
2.6	Records					
2.6.1	Does the Grower Group maintain records to demonstrate effective control of the Organic Farming Regulations quality management system and compliance with the requirements of the Organic Farming Regulations? WHICH RECORDS GGO MAINTAINS RELATED TO CONTROLS					
2.6.2	Are the records related to the Organic Farming Regulations Quality systems kept for a minimum of 5 years?					
2.6.3	Are all records genuine, legible, stored and maintained in suitable conditions and accessible for inspection as required? HOW DO YOU KEEP RECORDS					

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2.6.4	Are records that are kept on-line and electronically available during inspections and are back-ups available at all times? EXPLAIN HOW YOU BACK-UP THE ELECTRONIC RECORDS					
2.6.5	General map indicating the general region of the production zone is present? ATTACH THE MAP					
2.6.6	A more detailed map indicating the location of each of the communities to be inspected is present? ATTACH THE MAP					
2.6.7	Grower lists by community, listing producers, producer codes or numbers, amount of land area under production by each producer, crops, estimated yields, and past production history are ready? ATTACH THE PRODUCER LIST					
2.6.8	GGO maintains individual producer records such as parcel maps and grower agreements which are generally reviewed at the time of inspection are complete and ready for inspection? EXPLAIN WHICH INFORMATION and DOCUMENTS YOU KEEP FOR INSPECTION					
2.6.9	Organic system plan of GGO is complete and ready for inspection? MAKE SURE OCP-GGO QMS IS COMPLETED FOR INSPECTION					
2.6.10	Certification questionnaires used by the field officers are complete? MAKE SURE ALL QUESTIONNAIRES WERE FILLED IN BY FIELD OFFICERS					
2.6.11	Application documents are ready and send to ETKO for evaluation before inspection? EXPLAIN WHICH DOCUMENTS ARE READY TO SEND TO ETKO BEFORE INSPECTION					
2.6.12	Name of contact persons with phone numbers, mobile, home and work are listed and present in the GGO office? It is important to have access to at least two contacts in case the primary contact person cannot be reached. INDICATE NAMES AND TEL NRS OF CONTACT PERSONS FOR GGO					
2.6.13	A description of the project to understand how it is organized is prepared and present for inspection? A previous inspection report should be provided for certification updates. ATTACH THE PROFILE OF THE GGO					
2.6.14	If GGO operates processing and/or storage facilities; handling plans, questionnaires/applications are prepared and updated for upcoming ETKO inspection? (OCP-Processing, OCP-Agriculture, etc) EXPLAIN IF ALL APPLICABLE OCP'S ARE READY FOR INSPECTION					

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2.6.15	Information on farmers purchases, final sales and distribution is prepared and ready for ETKO inspection? This is important to determine if any off-site export or storage facilities need to be inspected. ATTACH DELIVERY LIST AND SALES					
2.6.16	Internal self inspections were completed for each producer? INDICATE IF EVERY PRODUCER WAS INSPECTED BY FIELD OFFICERS					
2.6.17	Sanctions are documented and kept in files? LIST THE SANCTIONS IMPLEMENTED					
2.6.18	Expected or realised harvest records are available? INDICATE EXPECTED AND REALISED HARVEST					
2.7	Complaint Handling					
2.7.1	Does the Grower Group have a system for effectively managing customer complaints? ATTACH COMPLAINT PROCEDURE					
2.7.2	Is there a documented procedure, which describes how complaints are received, registered, identified, investigated, followed up and reviewed? EXPLAIN COMPLAINT PROCEDURE					
2.7.3	Is the procedure available to customers as required? EXPLAIN IF THIS PROCEDURE IS AVAILABLE FOR CUSTOMERS					
2.7.4	Does the procedure cover both complaints to the Grower Group and against individual Growers and/or applicable farm sites and/or produce handling/ production sites? EXPLAIN IF ALL IS INDICATED IN COMPLAINT PROCEDURE					
2.8	Internal Audit/Inspection					
2.8.1	Quality Systems Audit					
2.8.1.i	Is the quality management system for the Organic Farming Regulations scheme audited at least annually? INDICATE HOW OFTEN YOU REALISE QMS AUDITS					
2.8.1.ii	Are the Internal Auditors suitably trained and are they independent of the area being audited? ATTACH INTERNAL AUDITORS CV'S AND TRAINING RECEIVED					
2.8.1.iii	Are records of the internal audit plan, audit findings and follow up of corrective actions resulting from an audit maintained and available? ATTACH THE LATEST INTERNAL AUDIT AND CORRECTIVE ACTIONS					
2.8.2	Growers/Farm Inspection					

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2.8.2.i	Are inspections carried out of each registered Grower/Farm at least once per year against the Organic Farming Regulations requirements, based on Organic Compliance Plan? ATTACH THE LIST INDICATING INSPECTION DATES OF THE FARMERS					
2.8.2.ii	Is there a process for the review of the inspection reports and Growers/Farms status? EXPLAIN HOW INSPECTION REPORTS REVIEWED					
2.8.2.iii	Are the original inspection reports and notes maintained and are they available for inspection as required? Are new members of the Grower Group always inspected prior by the Grower Group as part of the conditions for adding new members to the Organic Farming Regulations registered Grower list? WHERE DO YOU KEEP THE ORIGINAL INSPECTION DOCUMENTS, HOW DO YOU ACCEPT A NEW FARMER IN THE GROUP					
2.8.2.iv	Do the inspection reports contain the following: Identification of registered Grower, Signature of auditee (registered member), Date, Inspector, Registered products, Evaluation result against of Organic Farming Regulations requirements, Details of any Non-compliances identified, Organic Farming Regulations status? INDICATE WHICH POINTS ARE COVERED BY THE REPORT					
2.8.3	Internal Inspector Requirements					
2.8.3.i	Do the internal Inspectors meet the educational requirements? ATTACH CV'S of INTERNAL INSPECTORS					
2.8.3.ii	Is the inspector able to take ultimate independent decisions regarding the compliance of the member farms/Growers within the Grower Group, based on the internal inspection process and conclusions? EXPLAIN HOW YOU SECURE INDEPENDENCY and CONFLICT of INTEREST OF INSPECTORS					
2.8.4	Non-compliances and Corrective Action Systems					
2.8.4.i	Is there a procedure to handle non-compliances and corrective actions which may result from internal or external audits and/or inspections, customer complaints or failures of the Quality System? INDICATE YOUR NON COMPLIANCE PROCEDURE					
2.8.4.ii	Are there documented procedures for the identification and evaluation of non-compliances to the Quality System or operations? ATTACH NC PROCEDURE					
2.8.4.iii	Are the corrective actions following a non-compliance evaluated and is there a timescale defined for action? EXPLAIN HOW YOU HANDLE NON-COMPLIANCES					
2.8.4.iv	Is the responsibility for implementing and resolving corrective actions defined?					

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	EXPLAIN HOW YOU IMPLEMENT AND RESOLVE CORRECTIVE ACTIONS					
2.9	Product Traceability and Segregation					
2.9.1	Is the product meeting the requirements of the Organic Farming Regulations and marketed as such, traceable and handled in a manner which prevents mixing with non-organic products? EXPLAIN YOUR TRACEABILITY SYSTEM					
2.9.2	Is there a documented procedure for the identification of registered products and to enable traceability from the field/orchard/greenhouse to the produce handling site of both conforming and non-conforming products of all productions? Has a mass balance exercise been carried out to demonstrate compliance? EXPLAIN WHICH POINTS MENTIONED TREACEABILITY SYSTEM COVERS					
2.9.3	Does the Produce Handling site operate procedures which enable registered product to be identifiable and traceable from receipt, through handling, storage and despatch? EXPLAIN WHICH RECORDS YOU KEEP FOR TREACEABILTY					
2.9.4	Are there effective systems and procedures in place to negate any risk of mislabeling or mixing of Organic Farming Regulations registered and non-organic products? EXPLAIN HOW YOU AVOID COMMINGLING-CONTAMINATION					
2.10	Sanctions and Non-Conformances					
2.10.1	Does the Grower Group operate a system of sanctions with their Growers/ Farms, which meet the following requirements defined in the Organic Farming Regulations? EXPLAIN YOUR SANCTION AND NC SYSTEM					
2.10.2	Do the contracts with individual Growers/Farms define the procedure for sanctions including the levels of Warning, Suspension and Cancellation? INDICATE IF CONTRACT COVERS THE SANCTIONS					
2.10.3	Does the Grower Group have mechanisms in place to notify ETKO immediately about Suspensions or Cancellations of registered Growers/Farms? EXPLAIN YOUR PROCEDURE TO INFORM ETKO ABOUT THE SANCTIONS					
2.10.4	Are records maintained of all sanctions including evidence of subsequent corrective actions and decision-making processes? INDICATE WHICH DOCUMENTS YOU KEEP RELATED TO SANCTIONS					
2.11	Withdrawal of Certified Product					
2.11.1	Are there documented procedures in place to effectively manage the withdrawal of registered products when that is required? EXPLAIN YOUR SYSTEM OF WITHDRAWAL OF CERTIFIED PRODUCT					

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2.11.2	Are there procedures that identify the types of event which may result in a withdrawal of product, the persons responsible for taking decisions on the possible withdrawal of product, the mechanism for notifying customers and ETKO and methods of reconciling stock? EXPLAIN YOUR SYSTEM OF WITHDRAWAL					
2.11.3	Is the procedure capable of being operated at any time? INDICATE WHEN WAS THE LAST TIME YOU IMPLEMENTED THIS PROCEDURE					
2.11.4	Is the procedure tested in an appropriate manner at least annually to ensure that it is effective and are records of the test retained? INDICATE THE DATE OF LAST EVALUATION					
2.12	Use of the Organic Farming Regulations Logo					
2.12.1	Is the use of the Organic Farming Regulations logo, trademark and registration number on products demonstrated to be under the controls of the Grower Group and is it in accordance with the Organic Farming Regulations requirements? INDICATE WHICH LOGOS YOU USE TO YOUR PRODUCTS					
2.12.2	Where the Organic Farming Regulations logo, trademark and registration number is to be used, is there a written procedure defining the conditions of use in accordance with the Organic Farming Regulations and ETKO Logo usage on certification that may apply? ATTACH YOUR LOGO USE PROCEDURE					
2.12.3	Is the use of the trademark controlled and is a register of the certified products, Growers/Farms and trade names using the trademark maintained? EXPLAIN HOW YOU CONTROL THE PRODUCERS USE ORGANIC LOGOS OR OTHER INDICATIONS					
2.12.4	Does the use of the Organic Farming Regulations logo follow stipulations set out in Organic Regulations at all times? EXPLAIN IF YOU FOLLOW THE AMENDMENTS, UPDATES IN REGULATIONS					
2.13	Subcontractors					
2.13.1	Are there procedures to ensure that any services subcontracted to third parties carried out in accordance with the requirements of the Organic Farming Regulations? INDICATE IF YOU USE ANY SUBCONTRACTORS, WHICH ONES					
2.13.2	Are records maintained to demonstrate that the competency of any subcontractor used is assessed and meets the requirements of the standard? EXPLAIN IF SUBCONTRACTORS ARE COMPETENT AND DO NOT AFFECT THE QUALITY OF ORGANIC PRODUCTS					

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2.13.3	Do subcontractors work in accordance with the Grower Group Quality System and relevant procedures and is this specified in service level agreements or contracts? EXPLAIN IF YOU TRAINED SUBCONTRACTORS RELEVANT GG QMS					
	Checklist for Requirements for Internal Grower Group Inspector					
2.14.1	Formal Qualifications ATTACH A DETAILED CV OF THE INSPECTORS					
2.14.1.1	Post-high school diploma					
2.14.1.1.i	Has at least a post high school diploma or equivalent (minimum course duration of 2 years) been obtained in a discipline related to the scope of the certification?					
2.14.1.1.ii	Where no qualifications are held, has the (sector module) internal Grower group inspector undergone a competence evaluation set by ETKO, that involves an interview that verifies experience to at least 1 year and practical knowledge in the respective sector, inspection attitude, and has the inspector undergone training in the standard, and have a minimum of 2 witness internal inspections been performed in the respective sector? (These requirements are additional to those set out in the Technical Skills and Qualifications).					
2.14.2	Technical Skills and Qualifications					
2.14.2.1a	Food Safety Training					
2.14.2.1.i	Training in HACCP principles either as part of formal qualifications or by the successful completion of a formal course based on the Codex Alimentarius principles?					
2.14.2.1.ii	Food hygiene training either as part of formal qualifications or by the successful completion of a formal course?					
2.14.2.1b	GAP Training					
2.14.2.1.iii	Pesticide and fertiliser training either as part of formal qualifications or by the successful completion of a formal course?					
2.14.2.1.iv	Basic knowledge of veterinary medicine and stockmanship training including animal health and welfare issues?					
2.14.2.1.v	Has a minimum of 1 year post-graduate experience been gained in the relevant industry after finishing academic studies?					
2.14.2.2	Communication Skills					
2.14.2.2.i	Does the inspector have working language skills in the corresponding native/working language? Does it include the locally-used specialist terminology in this working language?					
2.14.2.2.ii	Are exceptions to this rule consulted with ETKO?					

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2.15	The Internal Control System and Organic Control Points					
	Assess the internal control system: The most critical component of both the grower group inspection and the grower group inspection report is the assessment of the internal control system. (A grower group inspection is in fact an evaluation of the internal control system.) The report must address the steps taken by the internal control system to enforce compliance with organic standards.					
2.15.1	Have the producers been provided copies of the standards in a language or format they understand? INDICATE HOW YOU EXPLAINED REGULATIONS TO FARMERS					
2.15.2	Does the internal control system use individual inspection reports to assess producers compliance? INDICATE WHICH DOCUMENT IS USED FOR FARMERS ASSESSMENT					
2.15.3	Official representatives of the control system visit each operation enough that integrity of organic production is sustained? INDICATE HOW OFTEN FARMERS ARE VISITED					
2.15.4	Documents are generated to verify these visits are kept ? INDICATE HOW/WHERE YOU KEEP THESE DOCUMENTS					
2.15.5	Are new producers inspected prior to being added to the GGO? EXPLAIN THE PROCEDURE TO ADD NEW MEMBERS					
2.15.6	Have all grower group members signed a contract stating that they will comply with the organic standards and permit annual inspections? ATTACH AN EXAMPLE OF FARMER AGREEMENT					
2.15.7	Are producers provided assistance to comply with the standards? EXPLAIN ADVISORY AND THE NAME OF THE ADVISOR					
2.15.8	When non-compliance is suspected or detected, it is evaluated, documented and further actions are taken according to GGO quality system? EXPLAIN NON-COMPLIANCE PROCEDURE					
2.15.9	Are there records of the actions taken when non-compliance has been investigated? EXPLAIN IF RECORDS ARE KEPT					
2.15.10	Does the control system have an official "sanctions" policy? EXPLAIN SANCTION PROCEDURE OF GGO					
2.16	Organic Control Points: . It is very important to describe the organic control points of the overall operation, where loss of organic integrity may occur. The inspector should report the preventative steps taken to protect organic products, and identify deficiencies where organic control points are not sufficiently addressed.					
2.16.1	Registers of grower group members are complete and clear? INDICATE WHICH FORM IS USED FOR REGISTRATION AND ATTACH ONE EXAMPLE					

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2.16.2	Are maps clear and adequate? ATTACH OVERVIEW AND DETAILED MAPS OF THE PRODUCTION FIELDS					
2.16.3	Inclusion of new fields or new producers is done according to Organic Regulations? INDICATE THE METHOD OF REGISTERING NEW PRODUCERS					
2.16.4	Do producers understood that also use of synthetic fertilizers are not allowed as well as herbicides or pesticides? EXPLAIN HOW YOU TRAIN FARMERS					
2.16.5	There is no use of used agrochemical bags or containers for harvested products? EXPLAIN HOW YOU AVOID FARMERS USING UNPROPER PACKING OR TRANSPORTING MATERIAL					
2.16.6	Contamination during storage or transport, e.g.: boats with gas and water in bilge, or storage under the house with gas and paint on top of product are evaluated during the internal self inspection? EXPLAIN HOW INTERNAL AUDITOR CHECKS STORES AND TRANSPORT TO AVOID CONTAMINATION					
2.16.7	Buffers or separation from other crops that have chemicals e.g. are wide enough to protect the organic crops? IN EVERY STEP OF PRODUCTION HOW YOU AVOID CONTAMINATION FROM ANY SOURCE					
2.16.8	GGO takes necessary measures to avoid from inclusion of crops from neighbors or relatives who are not on the producer list? EXPLAIN HOW YOU CHECK COMMINGLING OF CONVENTIONAL AND WHICH MEASURES ARE TAKEN					
2.16.9	Intentional chemical use. "I only used a little bit." is not present? INDICATE WHICH MEASURES ARE TAKEN AGAINST INTENTIONAL USE OF CHEMICALS					
2.16.10	Shared use of backpack sprayers which are also used for applying prohibited materials is not present? INDICATE IF THERE IS ANY PRODUCER HAVING ORGANIC AND CONVENTIONAL PRODUCTION AND EXPLAIN HOW TO AVOID USING SAME EQUIPMENT AND TO CLEAN THE EQUIPMENT BEFORE USE FOR ORGANIC					
2.16.11	Internal purchase and transaction records within the grower group is present? EXPLAIN HOW THE PRODUCERS KEEP RECORDS FOR PURCHASE and TRANSACTION					
2.17	Grower Group Inspection Report Guide: The grower group inspection report basically follows the outline for a farm inspection report. However, sections may need to be expanded, added, or modified. For example, a section on Organizational Management is helpful to describe many aspects of the project. This section should describe the structure and assess the functioning of the internal control system. It should also list the names of communities, number of producers in each, hectares of each, and, if possible, estimated yields, with totals.					

Ref Nr		Organic Compliance Plan-Grower Group QMS	Operator Comments	Inspector Comments	Doc Nr	OP 02 F 03
					Date	01.09.2016
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NA: Not Applicable, NCR: Non conformity, MA: Major, MI: Minor, PoA: Point of Attention						
	The following outline summarizes the general areas of grower groups that should always be inspected, and provides a list of the additional topics which must be covered in a grower group organization inspection report: Folowing issues should be clearly explained by the Internal Control responsible in annual GGO Inspection Report.					
2.17.1	Background of GGO is explained in GGO inspection report? GIVE BRIEF INFORMATION OF THE GGO IN GGO ANNUAL REPORT					
2.17.2	Project headquarters and audit trail information; organization, accessibility, and accuracy of information; projected yields of products requested for certification are all explained? LIST and EXPLAIN ALL NECESSARY INFORMATION IN ANNUAL REPORT					
2.17.3	Organization management, internal control system, and compliance mechanisms, including records are all maintained? KEEP ALL RELEVANT RECORDS IN OFFICE FILES AT LEAST FOR 5 YEARS					
2.17.4	List of communities are present? ATTACH PRODUCER LIST					
2.17.5	Grower numbers, name crops, hectares, expected&realised yields were summarized? ADD ALL INFORMATION IN THE FARMERS LIST					
2.17.6	All processing facilities, both on-farm and off-farm was explained and address, tel, fax, etc are present? LIST THE PROCESSING, STORAGE FACILITIES UTILISED					
2.17.7	Transportation systems are clearly explained? EXPLAIN HOW THE PRODUCTS ARE TRANSPORTED					
2.17.8	Storage facilities and organic products handling are described? EXPLAIN PRODUCTS HANDLING					
2.17.9	Field conditions; internal inspector observations are mentioned? EXPLAIN THE GENERAL CONDITIONS AND INSPECTORS OBSERVATIONS					
2.17.10	Risk assessment; adjoining land uses; other organic control points were examined and findings, preventive measures are mentioned in GGO report? EXPLAIN YOUR RISK ASSESSMENT IN GGO ANNUAL REPORT					
2.17.11	Inputs used were detailed? LIST THE INPUTS USED FOR FARMING AND HANDLING					
2.17.12	Equipment used were explained? LIST THE EQUIPMENT USED AND EXPLAIN WHICH PURPOSE IT IS USED					
2.17.13	Packaging materials used were evaluated and results were mentioned? EXPLAIN HOW YOU EVALUATE THE PACKAGING MATERIAL					
2.17.14	Producer interviews; internal inspector observations were recorded? EXPLAIN HOW INTERNAL INSPECTOR RECORDS HIS OBSERVATIONS					

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2.17.15	Education of producer understanding of organic principles and standards were done and results were reported in GGO report? INDICATE THE EDUCATION PROVIDED TO THE PRODUCERS IN ANNUAL REPORT					
2.17.16	Split operations - production of non-organic crops/products by grower group members were assessed and the results were mentioned in GGO report? INDICATE THE RESULTS OF INSPECTING THE SPLIT OPERATIONS					
2.17.17	Attachments were prepared and kept in GGO file for inspections? THE ATTACHMENTS MENTIONED ABOVE MUST BE PREPARED AND KEPT IN THE OFFICE FILES FOR INSPECTIONS					
2.18	Outline for Organization and Assessment of the Internal Control System (ICS)					
2.18.1	Field officers: are there enough number of field officers employed by the GGO? (Maximum grower number is 500 for each field officer to inspect where the production areas very small such as 0.01-1.00 ha. When hectares are bigger such as 1.00-5.00 ha maximum number is 300 producers, when the hectares are between 5.00-20.00 ha then maximum number is 200 producers.)					
2.18.2	Are their roles clearly explained and documented for the information/extension, registration of growers and internal control? EXPLAIN THE ROLES AND RESPONSABILITIES OF THE GGO STAFF					
2.18.3	Field officers responsible for internal control do not advice the same growers? THE INTERNAL INSPECTORS CAN NOT ADVISE THE PRODUCERS THEY INSPECT, EXPLAIN HOW YOU DELEGATE STAFF					
2.18.4	Rotation of field officers as internal inspector and advisor avoid the conflict of interest issues? FIELD OFFICERS AND INTERNAL INSPECTORS MUST AVAOID CONFLICT OF INTERET ISSUES, EXPLAIN HOW YOU MANAGE IT					

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NA: Not Applicable, NCR: Non conformity, MA: Major, MI: Minor, PoA: Point of Attention

3. Inspection of Grower Group Members

3.1 Calculation of the sampling size

Total number of registered members belonging to the Grower Group: Please indicate the total number and square roots.

A minimum inspection sample size must be based on the square root of the number of registered Growers/Farms. ETKO can at his discretion and based on justifiable criteria increase the verification rate up to a maximum of 4 times the square root of total number of registered Farms/Famers

Fruits, Vegetables, Combinable crops and Protected crops: Sample size calculation shall be based on the numbers of registered Growers/Farms separated into each of the following crop type:

Crop type	Number of farms	Square root (√)
Protected crops		
Open-field crops		
Perennial crops		
Total number of farms to be inspected:		

A minimum inspection sample size will be based on the square root of the number of registered Growers/Farms that have been registered under **each combination of** modules. For example if a group of Growers is certified to Organic Farming Regulations under dairy, cattle & sheep and poultry, then the square root of the total number of Growers within the group would be the sample size. If within that group of Growers, there are some that additionally have pig production under Organic Production, then the square root of that small group would also be inspected, as they have a different combination of modules that are Organic Farming Regulations certified Sample size calculation shall be based on the numbers of registered Growers/Farms separated into each of the following product types:

Product type	Number of farms	Square root (√)
Housed products		
Open-field products		
Breeders / Rearers		
Finishers		
Total number of farms to be inspected:		

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3.2 List of inspected members			Internal Controlling system requires 100% inspection otherwise the producers were not inspected by ICS will be disqualified. The list below will be the final farmers list for ETKO to consider.	
N°		Name of Farm / Grower	Compliance (Yes / No)	Comments
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
Use additional sheets if necessary				

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4 List of annexes: Indicate here which annexes you provide to ETKO related to your Organic Compliance Plan

Annex No	Document name

5 List of "NO" Answers: Indicate here your explanation for each NO answer

Reference number	Explanation

6 Summary of non-compliances Indicate here what Non conformities given during the last inspection and which corrective actions you took.

Any non-compliance, which shows deliberate mismanagement of Organic Farming Regulations related procedures will result in Immediate Complete Suspension of the producers certification and notification to ETKO is necessary

Number	Non compliance	Corrective action	When will be fulfilled

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7 CONFIRMATION

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

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

Hereby we declare that; The Grower Group Quality Management System and the Organic Farming Regulations sucessfully implemented in the member farms

Place, date:

Name of the representative:

Signature of the representative:

8 ETKO Results of verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		

Place, Date:

Name ETKO Representative

Signature of ETKO representative

	SAMPLING FORM – ÖRNEKLEME FORMU	Doc Nr	OP 03 F 01
		Date	08.09.2016
		Rev. Nr	01
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Sampling Form – Örneklem Formu		Report no	
Name of licensee		Licensee no	

Sampling location – Örneklem Yeri

Unit number - Ünite no	
Name of unit - Ünite ismi	
Address/ country – Adres/ ülke	

Characteristics of sampled product Örneklenen ürünün özellikleri

Name of product - Ürün ismi	
<input type="checkbox"/> Packed product - Paket ürün	<input type="checkbox"/> Fresh product - Taze ürün
<input type="checkbox"/> Labeled product - Etiketli ürün	<input type="checkbox"/> Processed product - İşlenmiş ürün
<input type="checkbox"/> Bulk product - Dökme ürün	
Field, silo or lot number Arazi, silo veya lot numarası	
Area or quantity of field, silo or lot Örneklenen ürünün miktarı	
Indications on label (in case of packed labeled product). etiketlerdeki bilgiler	

*Sample represents which quantity of the product, should be mentioned. *Örnek ne kadarlık bir ürünü temsil ediyor, belirtilmesi gerekir.

Sampling - Örneklem

Sample packed in Örnek paketi		Weight per sample Örnek ağırlığı	
ETKO seal numbers ETKO mühür numaraları	ETKO	Licensee / Müteşebbis	Laboratory
Date - Tarih			
Name of inspector Kontrolör ismi		Name of bystander Şahit ismi	
Signature of inspector İmza		Signature of bystander Şahit imza	

Analyses to be done: Yapılacak Analiz Türü

<input type="checkbox"/> Pestisit	<input type="checkbox"/> For all crops, products, textiles, cosmetics
<input type="checkbox"/> GMO: (Soybean, Corn, Processing aids (enzymes etc))	<input type="checkbox"/> For all crops, products, textiles, cosmetics
<input type="checkbox"/> Heavy metals: Lead, Nickel, cadmium etc..vd.	<input type="checkbox"/> Textile and cosmetics
<input type="checkbox"/> AZO	<input type="checkbox"/> Only textile products
<input type="checkbox"/> Antibiotics	<input type="checkbox"/> Only animal products, bee, dairy etc..
<input type="checkbox"/> Other	<input type="checkbox"/>

*This form was completed during the sample was taken in a professional way by the inspector on the date mentioned above.

*3 representative samples were taken and one is left for licensee, one is kept by ETKO and one is send to laboratory for analyses. *Bu form yukarıda belirtilen tarihte kontrolör tarafından alınan örneklem sırasında doldurulmuştur. *3 ayrı örnek hazırlanarak bir tanesi müteşebbise, bir tanesi ETKO'ya ve bir tanesi de analizler için laboratuvara gönderilmektedir.

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	RECORD CONTROL PROCEDURE	DOC.NR	SP 04
		DATE	10.03.2016
		REV. NR	06
		PAGE	1/5

1. PURPOSE

ETKO established this procedure to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of its records related to the fulfilment of ISO 17065 Standard.

ETKO retains records to demonstrate that all certification process requirements (those in ISO 17065 Standard and those of the certification schemes) have been effectively fulfilled.

2. RESPONSIBILITIES

MD, HI, QM&OM, QMR are responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

5. APPLICATION

All departments and personnel shall properly and regularly file and maintain the legal papers identified in QMS and records identified in QMS documentation. (This includes minutes of meetings also)

The following table provides information about the responsibilities and retention periods of the records according the QMS processes. The specific records for the processes are given in the relevant procedures.

Records shall be identified, indexed, filed and protected in an easily retrievable manner.

5.1 Storage of Records:

5.1.1 Hard Copy Records

All active client records kept in working office by its responsible after at the end of valid date all files and records kept in archive room.

Archive room responsible is Application Manager the room is always kept locked and can be opened by Application Manager and responsible for files security

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSİBLE	MANAGING DIRECTOR

	RECORD CONTROL PROCEDURE	DOC.NR	SP 04
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All hard copy records kept for a time period mentioned in the table below

5.1.2. Electronic Records

All electronic records (Quality system documents, control reports) in computer are transferred to a server everyday automatically Server also back-up all data its back up unit

5.2 Access to records:

Records related with certification shall be kept closed to the 3rd parties unless there is a legal requirement or a request from accreditation body. If this is the case these records are not accessible without the permission from QMR or MD

All personnel actively working at ETKO have full access to the procedures and forms (to have a general idea) in the system. But the responsibility of implementing each procedures are described at each procedure.

Only the MD (Managing Director) and OM (Office Manager) have access to the customer relation records, Subcontracting agreements, Conflict of interest and confidentiality agreements, Certification records and personnel files (such as personnel agreements, cv, etc..)

Only the QM (Quality Manager) will have access to the appeals and complaint file(s) records, the documentation records, internal audit record(s) and nonconformity records in the system.

Only the MD (Managing Director) and QM (Quality Manager) will have access to the Management review file (minute) records and the financial status of ETKO.

Only the OM (Office Manager) will have access to the qualification and training file records of each personnel working or related with ETKO.

Only the HI (Head Inspector) have access to prepare the inspection plans of ETKO's inspectors.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSİBLE	MANAGING DIRECTOR

	RECORD CONTROL PROCEDURE		DOC.NR	SP 04
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Personnel will have no access to the file(s) records unless the file(s) records is related with their status. Personnel determined to have violated the access restrictions will be warned. In repetition of such a violation the person will be evaluated by the MD or OM.

Managing Director, Certifier, head inspector, assigned inspector and related advisory committee members for that year's project will have access to review the projects document and the record files. Incase demanded accreditation body and Ministry official will have access to those records.

Each personnel at ETKO will be notified or trained about the files to which he/she has access too. These will be shown at the yearly training plan.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSİBLE	MANAGING DIRECTOR

	RECORD CONTROL PROCEDURE	DOC.NR	SP 04
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5.3 The period for file records

RECORDS	RESPONSIBLE DEPT. for MAINTENANCE	PERIOD	ACCESS AUTHORITY
Customer relations	MD, OM	5 Yrs	MD, OM
Subcontracting	MD, OM	Contract Period	MD, OM
Appeals, complaints	QM	5 Yrs	QM
Conflict of interest and confidentiality	OM	5 Yrs li	MD, OM
Personnel, qualification training	OM	Cont.	OM
Inspection planning, inspection, reporting	HI	5 Yrs	QM, HI
Internal audits	QM	3 yrs	QM
Management review	QM	3 yrs	MD, QM
Documentation	QM	5 Yrs	QM
Nonconformity & corrective actions	QM	3 yrs	QM
Certification	OM	5 Yrs	MD, OM
Personnel files	OM	Cont.	MD, OM
ETKO Financial Information	MD, ACM	10 Yrs	MD, ACM

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSİBLE	MANAGING DIRECTOR

	RECORD CONTROL PROCEDURE	DOC.NR	SP 04
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Sampling Records	OM	5 Yrs	HI

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSİBLE	MANAGING DIRECTOR

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	No doc	SP 05 F 02
		Date	29.06.2016
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Name Inspector Kontrolör Adı	Internal <input type="checkbox"/> Dahili personel	External <input type="checkbox"/> Harici personel
---------------------------------	--	--

Qualification for: Nitelendirme alanı	
<input type="checkbox"/> organic production agriculture: Türkiye de organic üretim	
<input type="checkbox"/> organic production processing (Food-Feed): Türkiye de organic işletme (Gıda ve Yem)	
<input type="checkbox"/> organic production and processing – international (Food-Feed): Uluslararası organic üretim ve işletme	
<input type="checkbox"/> organic textile:	<input type="checkbox"/> organic cosmetic:
<input type="checkbox"/> Globalgap - İTU:	<input type="checkbox"/> Other/Diğer:

PART 1

Note: part 1 shall be filled by relevant personnel as the qualification proceeds:

Bölüm 1 kalifikasyon işlemini yürüten personel tarafından tam olarak doldurulmalıdır

Requirements Gerekler	Training & Qualification Eğitim ve Nitelendirme	Approved Onay/tarih
Polytechnic or university degree in relevant subject (e.g. agriculture, food, forestry, textile, cosmetic, chemistry) İlgili konularda üniversite diploması (ziraat, orman, gıda, tekstil, kozmetik, kimya vs)	Should already be available or external training Uygun branşların birinden alınmış diploma olmalıdır	
Driver license Ehliyet	Should be available Olmalı	
Relevant training and or certificate provided by related bodies Yetkili kurum veya kuruluş tarafından verilen kurs veya katılım sertifikaları	Should already be available or by self-study or external training Sertifika olmalı veya dış eğitimlerle temin edilmelidir.	
General knowledge of organizational structure, internal communication, etc. Organizasyonel yapı iç haberleşme, bilgisi	Training by Quality manager or head inspector about ETKO system Ofis müdürü veya baş kontrolör ile formal görüşme, ETKO sisteminin tanıtılması	
General knowledge on relevant certification programs Sertifikasyon programları bilgisi	Training by (head) inspector and quality manager about certification procedures Başkontrolör, QM veya ofis müdürü tarafından sertifikasyon sistemi ve prosedürlerinin tanıtım eğitimi	
Knowledge on quality system Kalite sistemi bilgisi	QS Manual and relevant procedures and forms Training by quality manager KEK ve prosedürler QM tarafından eğitim	
Knowledge on administration systems Yönetim sistemi bilgisi	Introduction by office manager or by (head) inspector Başkontrolör veya OM tarafından eğitim	
Knowledge on relevant standards Geçerli yönetmelikler standartlara ilişkin bilgi	training by (head) inspector and/or other assigned employee Participation on inspections as trainee Başkontrolör veya bir görevli tarafından eğitim Kontrollerde gözlemci olarak görev alma	
Knowledge on sampling Örneklemeyle ilgili bilgi	applied training on sampling uygulamalı örneklemenin eğitimi	

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	No doc	SP 05 F 02
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Knowledge on certification programs and procedures and forms for certification/inspection Sertifikasyon programları bilgisi	Training by (head) inspector and quality manager about certification&inspection procedures, Participation on inspections Başkontrolör veya QM tarafından sertifikasyon /kontrol prosedürlerinin eğitimi Kontrollerde görev alma	
Knowledge on report writing, NCR writing... Raporlama, uygunsuzluk yazma bilgisi	Training by QM and (head) inspector case study, Participation on inspections as trainee Başkontrolör veya QM tarafından eğitim Uygulama çalışması Kontrollerde görev alma	
Knowledge on conflict handling and interpersonal and intercultural communication Sorun çözme, iletişim yeteneği	Participation of inspections as trainee Training by (head) inspector External training Kontrollere gözlemci olarak katılım Başkontrolör tarafından eğitim Dış eğitim	
Spoken and written knowledge of English and preferably German, French or Spanish İngilizce, Almanca, Fransızca veya İspanyolca okuma ve yazma yetisi olmalıdır.	Basic knowledge should already be available External training depending on the need Temel eğitim daha önce alınmış olmalı. Gereksinime göre dışardan eğitim kurslarına gönderme	

PART II for INSPECTOR QUALIFICATION – Kontrolör Kalifikasyonu

Inspections Kontroller	Performed (indicate units and inspection dates): Gerçekleşen (kontrol yerleri ve tarihlerini belirtiniz)
Perform inspection under attendance, for min 3 units (10 days for TC organic) Gözetim altında en az 3 ünitenin kontrolünde bulunması (TC Organik 10 gün)	
APPROVAL OF CONTROL DIVISION RESP / KONTROL BÖLÜM SORUMLUSU ONAYI	
NAME & SIGNATURE	DATE

	PERSONNEL EVALUATION FORM (ISO 17065-6.1.2, NOP 2027)	Doc Nr	SP 05 F 07
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Name		Position	
Duties and responsibilities			

No	Evaluation criteria	Result (Yes / No)-Comment
	Competency & Confidentiality	
1	Contract signed with ETKO?	
2	Disclosure Statement signed?	
3	Any conflict of interest observed related to the assignments	
4	Compliance to confidentiality rules of ETKO	
5	Education (and University license degree or over where applicable) which is valid according to ETKO competency requirements?	
6	Training received as required by ETKO competency requirements? (or Attendance the training sessions organized by ETKO or other activities related to his duties?)	
	Results of Activities Participated	
7	Degree of participation to quality improvement activities related to his/her duties	
8	Is there any specific skills need to be improved?	
9	Achievement of the objectives (if any given)	
10	Any major mistakes observed during the work related to his/her specific task?	
11	Any major customer complaints recorded during the work related to his/her specific task?	
12	Compliance to QMS requirements?	
13	Loyalty to ETKO	
14	Attitude in general	

	Performance feedback:	
	Summary of observation of past performances:	
	Performance Plan to guide development and improvement in the upcoming period	
	Qualification	
	Incase personnel does not meet the criteria the measures to be implemented to correct deficiencies in certification services	

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

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Review and approvals	Signatures	Date
QUALITY MANAGER		
MANAGING DIRECTOR		

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	RECRUITMENT AND TRAINING	DOC. NR	SP 05
		DATE	29.03.2016
		REV.NR	07
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1. PURPOSE

This procedure describes the method and responsibilities for the recruitment, qualification and training of the personnel in charge of evaluation and certification, and other staff

2. RESPONSIBILITIES

MD, QM&OM and Head Inspector are responsible for the proper implementation of this procedure.

3. RECORDS

SP 05 F 01	Inspector monitoring report
SP 05 F 02	Inspector qualification record
SP 05 F 03	Annual training plan
SP 05 F 04	Personnel Training record
SP 05 F 05	Inspector's control log
SP 05 F 06	Personnel agreement
SP 05 F 07	Personnel Evaluation
SP 05 F 09	Training Record Form
SP 05 F 10	On The Job Training Record Form

4. REFERENCES

GP 04	Subcontracting-personnel procedure
GP 16	Requirements for inspector qualifications
TI 19	Competency requirements for staff

5. APPLICATION

5.1 Personnel

ETKO employs, or have access to, a sufficient number of personnel to cover its operations related to the certification schemes and to the applicable standards and other normative documents.

NOTE ETKO employs full time and part-time personnel. Both personnel oblige to work under contract that places them within the management control and systems/procedures of ETKO.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

	RECRUITMENT AND TRAINING	DOC. NR	SP 05
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ETKO provide internal trainings to qualify the personnel for the functions they perform, including making required technical judgments, defining policies and implementing them. Personnel, including any committee members, personnel of external bodies, or personnel acting on the ETKO's behalf, keep confidential all information obtained or created during the performance of the certification activities, except as required by law or by the certification scheme.

5.2 Management of competence for personnel involved in the certification process

By implementing this procedure ETKO; establish, implement and maintains this procedure for management of competencies of personnel involved in the certification process. Therefore ETKO:

a-Determines the criteria for the competence of personnel ([TI 19 Competency requirements for staff](#)) for each function in the certification process taking into account the requirements of the schemes.

b-Identifies training needs and provide, as necessary, training programs on certification processes, requirements, methodologies, activities and other relevant certification scheme requirements as explained in paragraph 5.8 of this procedure.

c-demonstrates that the personnel have the required competencies for the duties and responsibilities they undertake as explained in paragraph 5.2

d-formally authorizes personnel for functions in the certification process by assignment letters.

e-Monitors the performance of the personnel as explained in paragraph 5.6 and 5.7

ETKO maintains the following records on the personnel involved in the certification process:

- name and address;
- employer(s) and position held;
- educational qualification and professional status;
- experience and training;
- the assessment of competence;
- performance monitoring;
- authorizations held within the certification body;
- date of most recent updating of each record.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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5.3 Contract with the personnel

ETKO requires personnel involved in the certification process to sign a contract or other document by which they commit themselves to the following: Therefore **Personnel Agreement SP 05 F 06** is signed;

- a) to comply with the rules defined by ETKO, including those relating to confidentiality and independence from commercial and other interests;
- b) to declare any prior and/or present association on their own part, or on the part of their employer, with:
 1. a supplier or designer of products, or
 2. a provider or developer of services, or
 3. an operator or developer of processes to the evaluation or certification of which they are to be assigned;
- c) to reveal any situation known to them that may present them or ETKO with a conflict of interest.

ETKO will use this information as input into identifying risks to impartiality raised by the activities of such personnel, or by the organizations that employ them.

To avoid risks to impartiality, fees are decided **fix salary for full-time personnel, daily fee for contracted personnel**, no commission or similar structures are decided for any fulltime or subcontracted inspectors. ETKO application department will not assign inspectors without signed contract.

Recruitment: MD, QM, HI coordinates the activities related to the selection and recruitment of new personnel.

Personnel are evaluated and selected during recruitment phase in accordance to the predetermined qualification criteria and competency requirements and then they are subject to ETKO training programs. **(TI 19 Competency Requirements For Staff)**

The new recruits shall sign the **Personnel Agreement (SP 05 F 06)**, stating and accepting that they are independent of any relation with the applicant, product and processes to be certified, preventing impartial and objective decision making, and ensuring the confidentiality of the information obtained. This agreement is also binding for the annual payment of the personnel and for each inspection it is constitutes a base for the services to be provided by inspector.

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Employees other than inspectors shall be subject to the general training programs in relation with QMS and procedures as determined by department responsible.

All inspectors shall be subject to the **orientation and monitoring program** upon recruitment.

Orientation and monitoring program includes the following at least:

- Getting acquainted with ETKO Quality Manual, procedures, instructions
- Certification program and procedures
- Training for inspection skills and application (For Inspectors)
- [On the Job Training \(for other departments\)](#)

[All staff except inspectors have on the job training and these trainings recorded and evaluated in **On The Job Training Record Form \(SP 05 F 10\)**](#)

New recruit inspector (subcontracted or not) is nominated as Assistant Inspector and shall complete the monitoring and orientation program listed in **Inspector Qualification Record (SP 05 F02)**

During the orientation, all the information received from employee during recruitment shall be verified.

The inspection skills of assistant inspectors shall be verified in the field by the head inspector or qualified inspector and their performances shall be recorded on **Inspector Qualification Record (SP 05 F02)** by the head inspector or qualified inspector in charge of monitoring.

Upon completion the **monitoring for 10 units positively, Inspector Qualification Record (SP 05 F 02)** is completed and assistant inspector is nominated as inspector.

To ensure and maintain the competencies of the inspectors their performances are monitored in the field and recorded on **Inspector Monitoring Report (SP 05 F 01)**. The results obtained from monitoring reports and the feedbacks obtained from clients are used as inputs in determining the further training requirements.

In every two years period, inspectors shall be monitored by head inspector or a qualified inspector. The monitoring reports are submitted to QM&OM to be filed in personnel files.

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Monitoring activities provide valuable information about inspector's performances on the field. In case of a deviation in the performance of an inspectors is observed, monitoring shall be applied and reported in the first possible instance. In case an inspector is to be appointed as HI, the same applies.

During the whole year all the personnel involved at ETKO's activities are taken under monitoring. The **Personnel Evaluation Form (SP 05 F 07)** is filled in by the Quality Manager or Office Manager to ensure the progress or the performance of the personnel involved at ETKO's activities. This form will be approved by the quality manager and the general director. The **Personnel Evaluation Forms (SP 05 F 07)** filled in for all the ETKO personnel will be lately send to the authorities when required. The feedback of the evaluation forms will be used as an input to progress the person at its weak aspects.

ETKO ensures through regular trainings indicated in **Annual Training Plan (SP 05 F 03)** that personnel involved in certification (i.e. inspectors and other certification personnel, including member(s) of committees) have and continue to have up-to-date technical knowledge in their respective fields of activity to enable them to conduct evaluation and certification effectively and uniformly.

Annual Training Plan (SP 05 F 03) is prepared and implemented by HI, QM&OM taking into account the information obtained from monitoring activities, complaints, changes in QMS, new products, new standards etc. Training plan indicates the time plans, subjects, trainers and training methods. Training may be in the form of meetings, messages, online and seminars/courses.

QM&OM is responsible for organization of the training activities as shown on training plan.

The effectiveness of the trainings provided are evaluated during the monitoring and recorded on **Inspector Monitoring Report (SP 05 F 01)**

The trainings provided to personnel are recorded to **Personnel Training Record Form (SP 05 F04)** by QM&OM and filed in their personal files.

All training records also kept in **Training Record Form (SP 05 F 09)** and evaluated the effectiveness in same form except Inspector Trainings. Inspector trainings' effectiveness evaluated in **Inspector Monitoring Report (SP 05 F 01)**

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All inspectors shall record their all assignments on **Inspectors Log (SP 05 F 05)** providing information about their activities and experiences on the field.

In-house training to the personnel will be evaluated and filed with the training files. This will be done to follow up effectiveness of the training.

5.6 Committees

Committees are formed by personnel who are competent and having appropriate technical knowledge in their fields as it is stated in the related procedures and terms of references.

Performance of committee members are monitored by MD on their attendances on the meetings and the role they play during the meetings. No single interest shall predominate and members shall be independent of the cases.

5.7 Back up personnel

Performance of backup personnel is monitored by MD and QM and, is subject to evaluation once a year. The general criteria for the evaluation include:

- The complaints received which are relevant to staff
- The issues (i.e number and frequency of mistakes) observed (not the nonconformities observed in internal audit) during performing their duties.
- Their participation to improve the quality of our services
- Loyalty
- Obedience to conflict of interest and confidentiality rules
- Adherence to the requirements of QMS.

The training plans are prepared and implemented as needed by the performance evaluation of staff, besides other precautionary measures (i.e repositioning, ending contract...)

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ETKO Inspection and Certification fees for national and international projects.

ETKO Ulusal ve Uluslararası projeler için kontrol ve sertifikasyon ücretleri

This procedure is applicable for both announced and unannounced inspections.

Bu prosedür haberli ve habersiz denetimler için geçerlidir.

Prior to Licensee Contract signed, ETKO and client will be agreed on for a basic fee related to the following fee schedule.

Lisans Anlaşması imzalanmadan önce ETKO ve Müteşebbis aşağıda belirtilen ücret tablosuna göre bir fiyatta mutabık kalırlar.

ETKO inspect and certify according to TC 27676/2010, EU Equivalent Standard IACB, NOP Regulation, COR, BIOSUISSE, NATURLAND, İTU – GLOBALGAP, HACCP, GOTS Global Organic Textile Standard, TE- OCS Textile Exchange –Organic Content Standards and COSMOS Cosmetic Standard.. ETKO TC 27676/2010, EU Eşdeğer Standardı IACB, NOP, COR, BIOSUISSE, NATURLAND Yönetmelikleri, İTU - GLOBALGAP HACCP ve GOTS Global Organik Tekstil Standardları, TE-OCS Textile Exchange Organik Content Standardları ve COSMOS Cosmetic Standartlarına göre kontrol ve sertifikasyon işlemi yapar.

Inspection cost (on site controls, analyses, reporting, inspector travel and preparation times, travelling and boarding costs).

Kontrol masrafları (alan kontrolü, tahlil, büro çalışmaları, kontrol seyahat ve hazırlık süresi, seyahat masrafları)

****Müteşebbise verilecek toplam ücret hesaplanırken ücretlendirme gösterge çizelgesi dikkate alınır.**

****Total estimation will be based on the fee schedule described in the Fee Calculation List.**

Subject - Kontrol	(Per) Inspector Kontrolör	Per day (Euro) Abroad projects Günlük yurtdışı projeleri	Per day (Euro) Turkey projects Günlük yurtiçi projeleri
Organic Agriculture/Processing/Export Organik Zirai Üretim/İşletme/İhracat, per scope	Inspector	500	500*
<i>Additional charge for big units, >1000 ha farm. 1000 ha dan büyük üretim işletmeleri için ilave ücret.</i>	Inspector	250	250
Organic Agriculture Grower Group Organik Zirai Üretim Üretici Grupları	Inspector	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory
Organic Food industry – Organik Gıda Sektörü Small Units/Küçük işletmeler. < 250 tons/year	Inspector	500	500
Organic Food industry – Organik Gıda Sektörü Medium size Units/Orta boy işletmeler. Between 250-1000 tons/year	Inspector	750	750
Organic Food industry – Organik Gıda Sektörü Big Units/Büyük işletmeler > 1000 tons/year	Inspector	1000	1000
<i>Textile industry – Tekstil Sektörü. Country base approach for India-Pakistan and Bangladesh is applied, per quota.</i>	Inspector	1000 + GOTS and/or TE License Fee	1000 + GOTS and/or TE License Fee
<i>*Textile and COSMOS input producer – Tekstil ve COSMOS girdi üreticisi</i>	Inspector	1000 + Cosmos License Fee	1000 + Cosmos License Fee
<i>*Sampling per sample – Örnekleme başına</i>		250	150
<i>Production inputs, fertiliser, pesticide etc.. Gübre, ilaç vb üretim girdileri</i>	Dealer: Satıcı: Ürün başına Per product	750 50	750 50
<i>İTU Certification</i> İTU Sertifikasyonu	Inspector	-	500
<i>GLOBALGAP Certification</i> GLOBALGAP Sertifikasyonu	Inspector	750 + General GG Fees	750 + General GG Fees
<i>İTU+GLOBALGAP Certification</i> İTU+GLOBALGAP Sertifikasyonu	Inspector	1000 + General GG Fees	1000 + General GG Fees
<i>İTU and GLOBALGAP Grower Group Certification</i> İTU ve GLOBALGAP Üretici Grubu Sertifikasyonu	Inspector	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory + General GG Fees	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory + General GG Fees
<i>HACCP Certification - Sertifikasyonu</i>	Inspector	750	750
<i>COSMETICS-COSMOS and CLEANING AGENTS</i>	Inspector	900	900

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Preparation, reporting Denetime hazırlık ve raporlama	Inspector	500	500
Travel time- Seyahat günlüğü	Inspector	350	350
Follow up certification Sertifikasyon işlemlerinin takibi	ETKO Stuff- ETKO personeli	500	500
Issuance, verification transaction certificates, Satış sertifikalarının düzenlenmesi	ETKO Stuff- ETKO personeli	350	350
Plus travel expenses – seyahat giderleri			
<p>Plane – bus – train – boat or taxi tickets which is applicable.</p> <p>Kontrol yerine geliş için hangi araç (otobüs – tren – vapur – taksi veya uçak) daha uygun ise bilet ücreti.</p> <p>In case inspector needs to drive company car, 0,20 Euro cent is charged per km travel.</p> <p>Şayet kontrolör şirket arabasıyla gelmek durumunda kalırsa km başına 0,20 Euro sent masraf talep edilir.</p> <p>Further administrative performances, issue of certificates on presentation of necessary documents, preparing import license to European Union and recertification:</p> <p>Diğer idari işler: Genel ve Satış sertifikalarını düzenlenmesi, yurtiçi veya AT ithalat izinlerinin düzenlenmesi, ve resertifikasyon yurtiçi veya AT.</p>			
Certification programs: TC 27676/2010, EU Equivalent Standard, NOP, COR, BIOSUISSE, NATURLAND Regulations, GOTS Textile Standards, TE-OCS Textile Exchange Organic Content Standards, İTU-GLOBALGAP, HACCP and COSMOS			EURO
Update of Master Certificate or annex related to products Genel sertifikanın veya eklerinin ürüne bağlı olarak yeniden düzenlenmesi			150
Additional product(s), processing/trading unit or agricultural unit minimum fee. Depends on the size of the unit above mention fees applied. İlave ürün(ler), işletme/pazarlama ünitesi veya zirai üretim alanının dahil edilmesi en düşük ücret. İşletmenin büyüklüğüne göre yukarıdaki listelenen fiyatlar uygulanır.			250
Additional operators certificate, or farmers registration documen for credit application İlave istenecek genel sertifika veya kredi başvurusu için üreticiye düzenlenecek sertifikalıdır belgesi			30
Lot related inspection certificate for import-export Ürünlerin alım-satımında düzenlenecek olan ürün sertifikası başına			40
Lot related inspection certificate for internal sales in small quantity only. Quantities exceeds 10000 TL= 5000 EURO=7000 USD value is subject to 40 euro fee. Ürünlerin iç piyasada küçük miktarlarda satışı esnasında düzenlenecek olan ürün sertifikası başına. Bu sadece küçük miktarlar için geçerlidir. Baz alınacak değer (10000 TL, 5000 EURO, 7000 USD dir.)			Per quata, per offer – Teklif düzenlenir
Preparation application for import authorisation TR (re-certification for the moment) Türkiye için hazırlanacak olan İthal İzin Başvurusu (şu anda resertifikasyon)			150
Preparation application for recognition of ETKO clients documents by another control body Yurtiçinde ETKO müşterisinin dökümanlarının hazırlanarak başka bir kontrol kuruluşuna verilmesi			50
Registration fee of the producers in producer groups to the ministry database per producer - Üretici gruplarında üreticilerin bakanlık veritabanına kaydedilmesi herbir üretici için			5
Recognition of certification done by other control bodies (recertification). Translation costs will be burned by the applicant. Diğer kontrol ve sertifikasyon kuruluşlarının sertifikalandırmış olduğu ürünlerin yeniden ETKO tarafından sertifikalandırılması. Tercüme gerekliyse masrafları başvuru yapan kişiye ait olacaktır.			EC 150 TC 50
Private Standards obligatory payments will be invoiced according to private standards requirements. Özel standartlara ait ilave ücretler müteşebbise standardın talebine göre fatura edilecektir. Örneğin GOTS tekstil ünitesi başına 120 euro lisans ücreti ve 30 euro yıllık ücret talep etmektedir. Cosmos toplam ciro üzerinden ücret tespit etmektedir. Example: GOTS requires 120 Euro per unit as Licensee fee and 30 Euro Annual Fee for textile units. For textile inputs 25 euro per product. Cosmos requires fees related to turnover			Standard requirement
ETKO charges additional evaluation fee for Textile Input per product ETKO tekstil kimyasallarının değerlendirilmesiyle ilgili olarak ürün başına değerlendirme ücreti .			75 euro
Investigation of irregularity charge (only reporting per incident) – Uygunlukların raporlanması (olay başına). Follow audits subject to daily inspection charges and other related costs. Takip denetim masrafları yukarıda belirtildiği şekilde yansıtılır.			350

Prices are based on Euro but TL maybe paid. Ücretler EURO cinsinden olup karşılığı TL ödeme yapılabilir.

Prices do not include TVA, Verilen ücretler KDV içermez.

Sampling does not include postage and the analyses costs by an accredited laboratory

Örnekleme ücreti örneğin laboratuvara ulaştırılması ve tahlil edilmesini kapsamaz. Licensee will be charged for extra travel or administration costs occurred.

İlave seyahat veya dökümantasyon işi oluşması durumunda oluşacak ilave masraflar müşteriye yansıtılır.

This form is delivered to licensees with the licensee contract. Bu form müşteriye Lisans Anlaşmasıyla birlikte ulaştırılır.

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Conditions of nonrefundable fees: Geri iadesi yapılmayan ücretler

To protect both sides from any mistake to be responsible for all losses which are not correct or deserved by the operator or ETKO; following procedure was developed for nonrefundable fees:

Olası bir hata veya değişiklik sonucunda doğacak kayıpların ETKO veya operatorün herhangi bir haksızlığa maruz kalmaması için “iadesi yapılmayan ücretler” konusunda aşağıda ifade edilen kurallar geçerli olacaktır.

Application-Başvuru: Fees for the first application and separate additional application for different processing or production locations, all fees paid. İlk başvuruda ve yeni bir işletme veya üretim alanı için ayrı başvuru yapılması durumunda yapılan bütün ödemeler

The first payment of total annual fee in case the first inspection was planned and the licensee was informed inspection dates. The first payment is usually $\frac{1}{2}$ of the annual inspection fee. Şayet ilk denetimle ilgili plan yapılmış ve müteşebbise plan gönderilmiş ise toplam yıllık ücretin ilk ödemesi. İlk ödeme yıllık ödemenin genellikle $\frac{1}{2}$ üdür.

Inspection-Denetim: If applicant wants to withdraw application, as a result of nonconformities were found during the inspection or document review, all fees paid. Şayet dökümanların incelenmesi veya ilk denetim esnasında uygunsuzluk tesbit edilmiş ve müteşebbis başvurusunu geri çekmek istemiş ise yapılan bütün ödemeler.

If applicant wants to change the certification operation to another inspection body in the middle of the inspection season, all fees paid. Müteşebbis denetim sezonunun ortasında sertifikasyon kuruluşunu değiştirmeyi isterse, yapılan bütün ödemeler.

Certification-Sertifikasyon: If cancellation, temporary or permanent suspension of certification of the operation was decided by ETKO, all fees paid. ETKO tarafından sertifikasyonla ilgili olarak iptal, geçici veya sürekli askıya alma kararı alınmış ise yapılan bütün ödemeler.

Appeal-İtiraz: After an appeal process if a re-inspection and review or any other costs associated with this confirmation needed. Herhangi bir hukuksal dava durumunda yapılacak olan denetim ve değerlendirmelerle ilgili olan veya doğabilecek diğer masraflarla ilgili yapılan veya yapılacak olan ödemeler.

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	ADVISORY COMMITTEE MEMBERS DANIřMA KOMİTESİ ÜYELERİ	Doküman No	TI 34 F 02
		Tarih	01.01 2017
		Rev. Nr	14
		Sayfa No	1/1

No	İSİM - NAME	MESLEK – PROFESSIONCY	UZMANLIK – GÖREVİ DUTY
1	İbrahim DUMAN	ZİRAAT MÜH. - Bahçe bitkileri. Prof.Dr. – Agriculture Engineer	Komite Başkanı Bütün programlar President - All programs
2	Hakan KARABACAK	ZİRAAT MÜH. - Ekonomist. MSc. – Agriculture Engineer	Komite Üyesi Bütün programlar Member - All programs
3	Hüseyin CEYLAN	ZİRAAT MÜH - . HAYVANSAL ÜRETİM, ARICILIK Agriculture Engineer – Dairy and Apiculture	Komite Üyesi Organik ve İTU Member - Organic, GAP and Cosmetic
4	Orhan Soğuksu	ORGANİK TEKSTİL ÜRETİCİSİ -- Organik tekstile plant manager	Komite Üyesi - Tekstil Member - Textile
5	LEVENT KAHRIMAN	KİMYA MÜHENDİSLERİ ODASI bşk yrd. – kozmetik üreticisi- Kimyager. Vise president of Chamber of Chemist, Organic Cosmetics producer and chemist	Komite Üyesi - Kozmetik Member - Kozmetik
6	TOLGA USKUÇ	Maden Mühendisi — ETO Temsilcisi, Tüccar – Trader, Mine Engineer.– ETO “Ecological Farming Association” Representative	Komite Üyesi - Bütün programlar Member – All programs
7	HÜSAMETTİN İŞİKLİ	Agricultural Engineer. Consultant- Background in organic certification	Komite Üyesi - Bütün programlar Member – All programs

Organik Gıda	–	Organic Food	-	5 üye -member
İTU	-	GAP Program	-	5 üye-member
Tekstil	-	Textile	-	5 üye-member
Kozmetik	-	Cosmetics	-	6 üye-member

Değişiklik kaydı:	Tarih
Tayyar Doğan ayrıldı	01.12.2016
Mustafa Kemal Sangün ayrıldı	30.12.2016

HAZIRLAYAN	ONAYLAYAN
KALİTE YÖNETİM SORUMLUSU	GENEL MÜDÜR

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1-Introduction

ETKO is an independent product certification organization developed specifically for the purpose of verifying the authenticity of foods and food products, [textile and cosmetic products](#) which are organically grown under a management policy of organic [production rules](#); and which are processed under goals of protecting, enhancing and extending the value invested in the organic product. Certification programs are managed in accordance with relevant national and international standards/requirements.

ETKO certification program was originated by two agronomists who were consulting for the organic producers and traders. This beginning set a quantitative agenda for the comprehensive program, which was to be developed. Through the addition of specific skills, and with appropriate technical and legal advice, the program has been carefully developed into a complete organic certification service.

ETKO certification services comply with the requirements of international accreditation standards, [ISO/IEC 17065:2012](#).

Complementary services to certification program may be provided to clients, these services cannot include consultancy. In this respect, consultancy does not include professional and technical information exchange which is the requirement of an inspection which is expected to be value added and meaningful to the client.

ETKO provides its services to the all potential clients complying with the relevant standards and requirements, not differentiating for the size, financial status, and number of certificates issued of the client. Application and certification processes are not accelerated nor slowed down consciously.

ETKO's program is designed to certify, as having been grown and / or processed according to an international standard / [regulation](#), the actual product, which is destined to enter into market distribution. Every step of the contributory chain from the land on which the product is grown, to the producer growing the product, to the post-harvest facilities cleaning, processing and storing the product must be inspected and certified. [This is not limited to food products only but also applicable for any other specific processing such as for textile ginning, spinning, weaving, knitting, confectioning and for cosmetic products related processing](#). Through this approach, certified finished products can convey the confidence that all contributed materials and / or processes have been equally and individually certified.

Fundamental to this program is the explicit understanding that it requires the full faith and confidence of all participants. Applicants are obliged to adhere to all of the terms and

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conditions of the program; and an agreement to that effect must be executed prior to commencement of the certification.

For organic food certification and ITU Turkish GAP program ETKO operates under the legal authority of Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and Co-ordination Council

ETKO Quality Manual describes, procedures and references in order to comply ISO/IEC 17065 Standard requirements, duties and responsibilities related to implementation of Quality Management System by the personnel, interactions between different operational departments of ETKO.

ETKO QMS contains Quality Manual, Procedures, Instructions, Forms and related Standards and Regulations. ETKO keeps the QMS updated, effective and safe within the organization. ETKO QM describes the Quality Management System and open for its personnel and interested parties.

2-Program Responsible ^{3.11}

ETKO is responsible to ensure that the processes and procedures needed for the management system are established, implemented and maintained. This is one of the responsibilities of Managing Director (MD). QMR is appointed by the General Manager to run the QMS. QMR is responsible preparing, updating and delegate a responsible staff for daily implementation of the QMS.

3-Approval

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.

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4-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.

5-Legal Status and Ownerships

ETKO Ekolojik Tarim Kontrol Organizasyonu Limited Sirketi is a limited company supporting its own activities with [only one owner](#). The fees charged to clients support all activities of ETKO. [Owner of the company is:](#) Mustafa AKYÜZ (Dr. Agronomist), 5.1.2

ETKO is registered to Chamber of Commerce and Industry of İzmir- Turkey (reg. number: 92592.1) and is registered to Ministry of Trade Of Turkey (reg. number 102591.)

All activities of ETKO is financed from the inspection and certification services provided to its clients.

ETKO headquarter address:

ETKO Ekolojik Tarim Kontrol Organizasyonu Limited Sirketi
160 sok. No 13/3 35040 Bornova Izmir, Turkiye
Tel : +90-232 339 76 06 - Faks : +90-232 339 76 07
E-mail: info@etko.org Web site: www.etko.org

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5.1- Shares Management

- Owner decides the shares of the company whether to accept another partner.
- If the owner become deceased shares automatically transmits to the nearest relatives of the owner, if not request different by the owner.

5.2-Changes in Management

- Owner has the power to change the management team
- If there is a need to change director, head inspector, quality manager and other personnel, this needs a general meeting with the management and a decision thereafter.
- To employ new inspectors needs a basic research about the person, qualification, diplomas, certificates etc.
- Relevant ETKO procedures are followed whenever it is applicable, in case of change in management.

5.3-Changes in Structure

- To change the structure of the body needs a general meeting with the management and a decision made, or owner of the company may decide himself..
- The change of structure needs an official process through notary and necessary governmental departments.
- The structure cannot be changed as a trade organization; ETKO cannot deal with buying and selling products that are certified by ETKO,
- ETKO cannot buy and sell products to the suppliers
- ETKO cannot provide consultancy services to the suppliers.
- ETKO cannot receive commissions, presents from any certified clients/parties has connection to the products and services ETKO provides.

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6-Certification Scope 3.10

ETKO Certification Scopes covers following programs:

IACB International Accredited Certification Bodies Equivalent European Union Organic Production & Processing Standard for Third Countries	Plant products (excluding wild harvest) Plant products (including wild harvest) Livestock and livestock products (excluding beekeeping) Beekeeping, Preparation of products, Producer Groups, Animal Feed Preparation
Turkish Organic Farming Regulation TC 27676/2010 and the Law 5488 dated 18/4/2006	Agricultural products, Livestock, Beekeeping, Processing and Inputs for organic farming and processing
Turkish GAP Program ITU Regulation 27778/2010	Fruits and Vegetables, Combinable crops, Flowers and Ornamentals
NOP-USDA	Crops, Wild Crop, Handling
COR-Canada	Crops, Wild Crop, Handling
BIOSUISSE-Switzerland	Plant products (excluding wild harvest) Plant products (including wild harvest) Livestock and livestock products (excluding beekeeping) Beekeeping, Preparation of products, Producer Groups, Animal Feed Preparation
KRAV-Sweden	Plant products (excluding wild harvest) Plant products (including wild harvest) Livestock and livestock products (excluding beekeeping) Beekeeping, Preparation of products, Producer Groups, Animal Feed Preparation
GOTS-Global Organic Textile Standard	-Certification of mechanical textile processing and manufacturing operations and their products -Certification of wet processing and finishing operations and their products -Certification of trading operations and related products

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	-Approval of textile auxiliary agents (chemical Inputs) on positive list
TE-OCS – Textile Exchange	OCS Organic Content Standard
COSMOS	Cosmetic Products Cosmetics Inputs Approval
GLOBALGAP	IFA Vegetables and Fruits

7-Principles

7.1-Basic Principles of Operation

The following rules strictly apply for the evaluation and certification processes and for the related personnel in charge.

- **Confidentiality**
- **Conflict of interest**
- **Impartiality**
- **Non discrimination**
- **Accessibility**

The policies and procedures under which ETKO operates are non-discriminatory and are administered in a non-discriminatory manner. ETKO assures that its procedures are not used to slow down or inhibit access by applicants.

ETKO certification services are kept accessible to all applicants who are organic producers, processors and similar, whose activities are related with our field of operations which is stated in Overview. ETKO, by no means, imposes any excess or other conditions on the applicants.

Access to ETKO services are not depended upon the size of the supplier or membership of any association or group, nor the certification is depended upon the number of certificates already issued.

7.2- Confidentiality and Conflict of Interest: 4.2

The confidentiality of the information obtained during certification process is safeguarded in all organizational levels of ETKO. This includes the committees and subcontractors.

Unless it is a requirement of accreditation body or the relevant accreditation standard, or of an applicable law, the information obtained during the certification process is not disclosed

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to third parties without the written approval of supplier. In case the law requires the information to be disclosed to a third party, the supplier is informed by ETKO management.

7.3-Impartiality: 4.2

- ETKO undertakes its certification activities impartially.4.2.1
- **ETKO is** responsible for the impartiality of its certification activities and does not allow commercial, financial or other pressures to compromise impartiality.4.2.2
- **ETKO** identifies risks to its impartiality on an ongoing basis. This includes those risks that arise from its activities, from its relationships, or from the relationships of ETKO personnel (for example over-familiarity between ETKO personnel and the client).
4.2.3
- *ETKO guarantees to avoid a relationship that threatens the impartiality which can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.*
- If a risk to impartiality is identified, ETKO eliminates or minimizes such risk to an acceptable level and report to Advisory Committee. 4.2.4
- **ETKO** personnel including Top Management commits to impartiality a signing Conflict of Interest & Disclosure Reports. 4.2.5
- **ETKO** and any part of the same legal entity and entities under its organizational control are not. 4.2.6
 - a-be the designer, manufacturer, installer, distributor or maintainer of the certified product (for process or service.
 - b-be the designer, implementer, provider or maintainer of the certified service;
 - c-be the designer, implementer, operator or maintainer of the certified process;
 - d-offer or provide consultancy to its clients related to the certified products, services or processes.
 - e-offer or provide management system consultancy (3.3 of ISO/IEC 17021) or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.

This does not preclude the possibility of exchange of information (e.g. explanations of findings or clarifying requirements) between ETKO and its clients and the use, installing and maintaining of certified products which are necessary for the operations of ETKO.

- **ETKO** ensures that activities of external organisations (separate legal entities) with which ETKO or the legal entity of which it forms a part has relationships (related organisation) do not compromise the impartiality of its certification activities. 4.2.7

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- **ETKO does** not have relationships with a related organisation which offers or provides the certified products or services or performs the certified processes or offers or provides consultancy related to the certified products, services or processes unless ETKO (with respect to the related organization) has different personnel in the management and in the decision making process. 4.2.8
- **ETKO's** activities are not be marketed or offered as linked with the activities of an organization that provides consultancy. ETKO does not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used. 4.2.9
- To ensure that there is no conflict of interests, personnel who have provided consultancy for, or been employed by a client, including those acting in a managerial capacity, will not be used by ETKO to make a certification decision for that client within two years following the end of the consultancy or employment. 4.2.10
- **ETKO** will take action to respond to any risks to its impartiality arising from the actions of other persons, bodies or organizations of which it becomes aware. 4.2.11

All ETKO personnel, either internal or external, or committees, who could influence the certification activities, will act impartially. 4.2.12

7.4-Non-discriminatory conditions

It is ensured that the policies and procedures under which ETKO operates and their administration is non-discriminatory. Procedures are not used to impede or inhibit access by applicants, other than as provided for in this International Standard. 4.4.1.

ETKO makes its services accessible by electronic means from the website www.etko.org to all applicants whose activities fall within the scope of its operations. 4.4.2.

ETKO ensure that access to the certification process is conditional upon the size of the client or membership of any association or group, or certification conditional upon the number of certifications already issued by fees procedure GP 07, and Fee Structure TI 14. 4.4.3

ETKO confines its requirements, evaluation, review, decision, and surveillance (if any) to those matters specifically related to the scope of the certification according to applicable scope requirements. To comply this requirement "GP" General Procedures, "OP" Operational Procedures, "SP" System Procedures, "TI" Technical Instructions are developed. 4.4.4

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8-Legal Regulations

8.1-Organic Production:

IACB: It has been adapted from the European Regulations (EC) 834/2009 and the more detailed implementing rules in (EC) 889/2008 to provide a base standard for the Accredited Certification Bodies and their certified organic operators (producers, processors and traders) working outside the European Union.

The ETKO Program offers assessment for compliance and/or equivalence with several different organic certification standards as mentioned section 6. Some are established and enforced via government regulations. ETKO is authorized by the Ministry of Agriculture in Turkey for Turkish Regulation for Organic Production. Authorisation was granted by USDA for National Organic Program (NOP) standards (7 CFR Part 205). EU Commission authorized ETKO for the European Organic Program (EEC 834/07) (assessed through the IACB EU Equivalence Standard). Canadian authorities authorized for the Canadian Organic Regime (COR) (CAN/CGSB 32.310).

There are different regulatory labelling programs such as Biosuisse for Switzerland and KRAV for Sweden, which ETKO is recognized to do assessment.

Other private organic standards are established by industry working groups, such as the Global Organic Textile Standards (GOTS), Textile Exchange Organic Content Standard and the COSMOS Organic cosmetic products and ingredient standard.

8.2-Good Agriculture Practice

ETKO program offers additionally assessments for compliance with Good Agricultural Production programs; ITU Turkish GAP program is developed by the Ministry of Agriculture for Turkish market which is a regulatory.

8.3-Globalgap

Globalgap is a private GAP standard developed by European retailers' consersium basically for European Market and accepted globally.

Depending on the standards, different types of products (i.e. food, fiber, cosmetics) are required and/or eligible for compliance assessment.

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9-Policy and Objectives ^{3.13}

Producers and processors of using national and/or international standards for their products have recognized the need for certain controls to verify their legitimate and unique economic endeavors. For this reason, these entities are demanding a **professional certification service**.

Purchasers and consumers of the products produced according to mentioned standards have also realized the need for an **independent third party service** to document the authenticity of these products.

In this respect, ETKO aims to be market leader as a Turkish service providing and certification company in its own sector.

Impartiality, Reliability, Objectivity, Confidentiality and Professionalism are the basic values and fundamentals of ETKO while providing certification services to its clients. ETKO top management commits to overtake impartiality for its activities.

ETKO management establishes, document, and maintain policies and objectives for fulfilment of applicable international standard EN ISO/IEC 17065 December 2012 and the certification scheme and ensures the policies and objectives are acknowledged and implemented at all levels of the personnel. 4.2.5

To achieve its aim and maintain its values, our principles are stated hereunder:

- Informing the current and potential clients about the updates in the system and certification requirements, continuously meeting their requirements, and thus enabling the **reinforcement of their system**.
- Improving the quality of our services in collaboration with the appropriate national and international parties.
- Providing certificates to clients, recognized in national and international levels.
- Ensuring the consistency in the services provided.
- Providing services in accordance with national/international ethical and professional values.
- Ensuring that certification services are conducted independent of any financial, commercial or other pressures.

The main aim and principles of ETKO are supported with the objectives hereunder. These objectives are documented and monitored annually.

- Monitoring the client satisfaction.
- Improving the client satisfaction continuously, utilizing the data collected from satisfaction surveys and complaints and implementing corrective actions.
- Starting certification programs as needed by the clients and getting accreditation.
- Training of the personnel to improve their qualifications.
- Monitoring the performance of the technical and other staff.

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Continuously improving the overall performance of ETKO utilizing the information collected from the field.

10-Quality System

10.1- Establishing and Maintaining of ETKO Quality Management System: 8.1.1

ETKO established and maintain its management system that is capable of achieving the consistent fulfilment of the requirements of ISO-IEC 17065/2012 Standard in accordance with Option A. The management system of ETKO addresses the following **8.1.2**

- General management system documentation (e.g. manual, policies, definition of responsibilities); Quality Manual, General Procedures, Operational Procedures, System Procedures, Technical Instructions, Job Descriptions and Forms
- Control of documents; SP 01 Document Control procedure
- Control of records; SP 04 Records Procedure
- Management review; SP 03 Procedure
- Internal audit; SP 02 Procedure
- Corrective actions; SP 06 Non-conformity & Corrective Actions Procedure
- Preventive actions SP 06 Non-conformity & Corrective Actions Procedure

General management system documentation (Option A) 8.2

ETKO's top management establish, document, and maintains policies and objectives (clause 9) for fulfilment of ISO-IEC 17065/2012 Standard and the certification scheme and ensures the policies and objectives are acknowledged and implemented at all levels of the ETKO's organization. 8.2.1. Implementation is guaranteed by in-house trainings and personnel evaluations are done on a regular basis within the ETKO. SP 05 F 07. **8.2.1**

ETKO's top management provides evidence of ETKO's commitment to the development and implementation of the management system and its effectiveness in achieving consistent fulfilment of ISO-IEC 17065/2012 Standard. 8.2.2. To achieve compliance ETKO trains its staff members by regular trainings are organized to calibrate personnel performances. Evaluations of personnel performances are realized once a year and recorded in SP 05 F 07.

ETKO's top management appoints a member of management (Quality System Responsible "QMR") who, irrespective of other responsibilities, have responsibility and authority that include the following 8.2.3

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- a) Ensuring that processes and procedures needed for the management system are established, implemented and maintained;
- b) Reporting to top management on the performance of the management system and any need for improvement.

All documentation, processes, systems, records, etc. related to the fulfilment of the requirements of ISO-IEC 17065/2012 Standard are included, referenced, or linked to documentation of the management system. 8.2.4. QMS documents indicates references of each section of the ISO 17065 standard appropriately.

All personnel involved in certification activities are authorized to have access to the parts of the management system documentation and related information that are applicable to their responsibilities. Assignment descriptions are explained in SP 04 Record Control procedure. 8.2.5

ETKO quality management system contains following: 8.1

- Management system documentation is set and managed according to SP 01 Documentation Procedure (8.2),
- Document control is done according to SP 01 Documentation Procedure (8.3),
- Record control is managed according to SP 04 Record Control Procedure (8.4),
- Management Review is managed according to SP 03 Management Review Procedure (8.5),
- Internal audit is managed according to SP 02 Internal Audit Procedure (8.6),
- Corrective actions (8.7), and Preventive actions (8.8) are managed according to SP 06 Non-confirmity & Corrective and Preventive Actions Procedure

ETKO Quality Management System documents are listed below:

- **Quality manual - QM**

The quality manual describes organizational structure, the policies to be followed and refers to the detailed procedures of certification system.

- **General Procedures - GP**

General procedures define the general methodology to be implemented in certification services. General Procedures are coded as GP

- **Operational Procedures - OP**

These are the procedures describing the work methods to be followed by the inspectors working on the field, and contain relevant technical details. They are coded as OP.

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- **System procedures - SP**

System procedures define the methods and responsibilities in relation with the ETKO Quality System, such as auditing, documentation. They are coded as SP.

- **Technical instructions - TI**

These documents are detailed technical documents defining the specific jobs to be performed either by the inspectors on the field, or by any relevant ETKO personnel

Technical instructions are prepared whenever there is a need for defining a specific job to be kept under control, under the scope of any group of procedures.

- **Records**

To show that the procedures and instructions are implemented effectively, records are kept by the relevant personnel. The records to be used are identified, where necessary, in the relevant documents.

- **Forms**

Forms are registered documents part of the QMS used by ETKO Stuff members to record their activities they are assigned for. Part of the forms are used by the subcontractors, applicant and/or certified clients when required. They are designed for the certification activities which procedures are correctly used, implemented, maintained and stored. These documents are described within the procedures and listed by Document Master List.

11-Documentation and Records

11.1-Documentation 8.3.1-8.3.2

ETKO quality system provides the following information as detailed in the Quality Manual, Procedures and Technical Instructions, as appropriate.

- Policy and objectives
- The authority under which ETKO operates
- Statement of product certification systems
- Procedures related with the evaluation and certification processes
- Procedures for customer related processes such as fees, use of logos, certificates...
- Procedures for nonconforming services and remedial actions (appeals, complaints, disputes, corrective action...)

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- Certified products and their suppliers

The internal and external documents in relation to certification activities are reviewed and approved for adequacy by QM and Managing Director, prior to their issue. The same applies for any subsequent amendment of the documents.

The documentation is managed by QM in accordance to the referenced procedure given in section D and the records of revised, updated, cancelled, issued documents are kept by QM.

11.2-Records 7.12.1-7.12.3, 8.4.1, 8.4.2

The records demonstrating that the requirements of ETKO procedures are met, such as certification, application, evaluation, granting...etc are kept under control as given in the reference procedure.

All the records are identified, managed and disposed taking into account integrity of the processes and the confidentiality. The appropriate retention period of the record, and relevant responsibilities are as given in the reference procedure.

Ensuring the confidentiality is a key factor in accessing to the records. Adequate arrangements are ensured according to the referenced procedures to safeguard the information kept on the records during certification processes.

Certification procedure, fee structure, appeal, complaint and disputes procedures are published in the www.etko.org site to provide applicants access.

12-Management Responsibility and Organizational Structure

ETKO is an international inspection and certification body operates under the international standards as accredited body for ISO 17065, USDA and other relevant accreditations such as TC, EU, COR, and other private sector scopes GOTS, TE and COSMOS approvals. Certification activities structured and managed so as to safeguard impartiality. 5.1.1

ETKO is an independent private company which is not defined a part of another legal entity. 5.1.2

12.1-Organization Structure 5.1.2

ETKO organization chart, departmental tasks and responsibilities are given by Annex 2. Detailed job descriptions are prepared by Office Manager and distributed to the personnel as appropriate

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12.2-Board

ETKO Board consists of Managing Director, QMR, Certifier, Office Manager, Head Inspection department and Accountant. Board is responsible to implement ISO 17065 Standard requirements. The board meets at least once in a year (in December) to review/carry out the followings. When appropriate it is combined with Management Review.

12.2.1-Duties of Board

- Ensure that ETKO quality system developed, implemented and improved in accordance with the accreditation rules (ISO 17065, NOP, COR, EU Equivalency, Gots, COSMOS and other applicable requirements). 5.1.3.a
- Supervision of the implementation of the policies and procedures. 5.1.3.b
- Supervision of financial status 5.1.3.c
- Development of certification activities and communicating to ADC if required. 5.1.3.d,
- Development of certification requirements. 5.1.3.e
- Feed back obtained from ADC meetings
- Personnel competence requirements and needs in general (trainings, qualifications...) 5.1.3.m
- Management system including implementation of policy, principles and areas of improvement as imposed by ADC. 5.1.3.n
- The effectiveness of the activities
- Achievement of the objectives
- Hardware needs
- Difficulties observed during daily operations and improvements
- New opportunities in line with the ETKO scope of operations.
- Client complaints and satisfaction

The outcome of these meetings is recorded by QMR and kept to monitor the realization of the planned works. The outcomes of these meetings are also the input to the management reviews.

Managing director has authority and responsibility for the management of daily activities and the implementation of the decisions taken in the a/m periodical meetings

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ETKO certification activities are monitored by Advisory Committee (ADC) of which terms of references are stated down below section 12.7.

12.2.2-Responsibilities of Board Members

Board members participate applicable undertaken consumer rights events, responsible for duties assigned for and eager to fulfill his assignments.

- Must participate regularly to Management Meeting
- Must be active in meetings
- Must follow the documents prepared and announced by ETKO carefully.
- Must follow up daily news in order to familiarize the society character and demands.
- Must take decisions for the favor of public without his own favor and take decision accordingly.
- Must keep Management meetings confidential and do not share the information from the meetings.

12.3-Managing Director (MD)

Managing Director has the overall responsibility for the followings:

- Customer relations, Personnel relations, Financing, Book-keeping, Taxes, Future plans, salaries
- Developing and implementing objectives, policies and strategies
- Ensuring that certification processes are implemented as per ETKO system and ISO 17065 requirements.
- Ensuring the proper planning and establishment of policies and procedures regarding the ETKO operations.
- Ensuring and maintenance of the proper technical basis for granting certification
- Ensuring the establishment and maintenance of a suitable method for decision on certification
- delegation of authority to committees or personnel, as required, to undertake defined activities on its behalf(see the org chart) 5.1.3.i
- Contracting and Subcontracting arrangements 5.1.3.j
- provision of adequate resources for certification activities 5.1.3.k

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12.4-Management Representative. MR

A management representative is assigned by the General Manager. MR task is dealing with the daily operation of the ETKO staff and relations in between, management of customer relations. Assisting the General Manager on issues of implementing the decision of the Board. Management representative may be assigned for the responsibility of quality management system as QMR if appropriate qualifications present.

MR Organizes meetings of the Board, management review and internal audit. The outcomes of the meetings and internal audits are reported and necessary assignments are realized to implement the decisions by MR and incase needed necessary corrections are realized.

12.5-Quality Management Responsible (QMR):

QMR is designated as management representative, irrespective other responsibilities. QMR has the authority to:

ETKO's top management appoints a member of management (Quality System Responsible "QMR") who, irrespective of other responsibilities, have responsibility and authority that include the following 8.2.3

- Ensuring that processes and procedures needed for the management system are established, implemented and maintained;
- Reporting to top management on the performance of the management system and any need for improvement.
- Improving and updating the QMS
- Preparation and issue of the QS documentation
- Internal auditing.

12.6-Quality Management Asisstant (QMA)

Quality and Office manager also assists QMR for the proper implementation of QMA.

- Running the office
- Recruitment of personnel
- Filing the personnel records and qualification records.
- Carrying out the duties as delegated by QMR , defined in QMS.

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12.7-Advisory Committee (ADC) 5.1.4, 5.2.1

12.7.1-ADC Structure:

Responsibility of certification decision belongs to Certifier related to all certification programs ETKO deals with. Above the certifiers an advisory committee was structured in order to have overall supervision of ETKO activities and certification decisions.

The ADC is an independent entity apart from Certifier and has the authority and responsibility to monitor all the certification process to ensure the compliance of the certification activities with the related accreditation rules (ISO 17065, NOP and other, are maintained. Committee members are free from any commercial, financial and other pressures that might influence decisions. 5.1.4

ETKO Managing Director has the authority to assign or resign the assignment of the ADC members. Members are assigned officially by a letter, in the case any member leaving the ADC an official letter is issued indicating no more assignment will be given to leaving member.

12.7.2- Authorities and responsibilities of ADC:

- Reviewing the policies and procedures on certification for improvement of the services
- Safeguarding the policies and principles relating to the impartiality of its certification activities 5.2.1.a.
- Monitoring the sector specific needs and providing advice to management on the development of policies and strategies
- Preparing advice according to accreditation rules, legal requirements, local and international rules.
- Providing advice for any improvement opportunity in certification processes.
- Ensuring ETKO services are offered impartially and in a fair and nondiscriminatory manner.
- Reviewing the quality management system
- Reviewing those applications on which the third party inspection has been completed
- Ensuring the impartiality of the decisions related with the certificates issued and certification processes to avoid any tendency on the part of ETKO allowing commercial or other considerations. 5.2.1.b

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- Deciding for conditions and procedures for approval, maintenance, extension, suspension, and revocation of certification.
- [Safeguarding matters affecting impartiality and confidence in certification, including openness. 5.2.1.c](#)
- Monitoring the relevant accreditation rules and guiding documents (ISO 17065, NOP, EA guides, EU Equivalency, COR, TC...)
- Following GAP programs legal infrastructure regulations
- According to ISO 17065 and any other legal enforcements provide advices when necessary

[There is no financial, family realationships between the committee members and the Managing Director and/or the shareholders of ETKO. They are independent for decision taking.](#)

12.7.3- Representation of interested parties:

[A balanced representation of significantly interested parties such that no single interest predominates \(internal or external personnel of ETKO are considered to be a single interest, and does not predominate\); therefore the ADC members contains members from the following areas: 5.2.2.a](#)

- 1 President (preferably an academic person with experience in organic sector of agriculture, chemistry, textile, cosmetics)
- 2 An academic (Agronomist, technician or zoo technician)
- 3 An expert from the sector who deals with advisory and/or production
- 4 A licensee-producer or trader
- 5 An expert in organic textile production
- 6 An expert in organic cosmetics production
- 7 An academic expert in organic cosmetic production
- 8 A representative of ETO Ecological Farming Organization Association [or any other similar organization](#) of Turkey
- 9 Quality System Management Expert

12.7.4- Assignment of ADC Members and Rights of the Committee:

Members of the ADC are appointed by Managing Director for 3 years; the membership duration can be extended by the approval of chairperson. [Assignment agreement is extended automatically if there was no conflict of the member.](#)

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Members are allowed to access to all the information necessary to enable it to fulfill all its functions. 5.2.2.b

The ADC has no organic connection to Managing Director and has the authority to report formally to the Managing Director, if it can demonstrate that ETKO evaluation and certification rules have been broken consciously and repetitively, and request urgent corrective action.

Further, ADC also has the authority to report to accreditation body, [authorities and stakeholders](#) if it can demonstrate that their advice has been disregarded by ETKO to the point where the rules of international accreditations have been broken. [In taking appropriate action, confidentiality requirements relating to the client and ETKO will be respected](#) 5.2.3

[Input that is in conflict with the operating procedures of ETKO QMS or other mandatory requirements will not be followed. Management will document the reasoning behind the decision to not follow the input and maintain the document for review by appropriate personnel.](#) 5.2.3

The ADC is comprised of competent personnel having appropriate technical knowledge and independent of certification processes. This ensures that reviewing the decisions related with certification is done by persons different from those of evaluation. Committee members are selected as to represent the interested parties as appropriate. 5.2.4

Advisory committee (ADC) consists of 8 regular members, from interested parties. The ADC may invite additional external members, in case of necessity, to represent the interested parties as needed by its agenda. These additional external members are included in the ADC according to ETKO procedures. 5.2.4

Chairperson of the ADC is the external regular member, having an academic degree and/or experience on organic sector of agriculture, chemistry, textile, cosmetics. A formal list of the ADC is kept by Managing Director, indicating the qualifications and parties represented.

The internal member of the ADC shall have work experience, and appropriate background, familiarity or training related quality systems and standards.

External members shall have

- work experience for at least 5 years,

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- appropriate background, familiarity or training related with the scope approved by accreditation body, and
- adequate and appropriate qualification for the work such that the interested parties are represented (organic food, textile, cosmetics...)
- knowledge about the accreditation rules,
- knowledge about the related legal and statutory requirements of the standard working with.
- Having experience and information in production, processing, developing, and marketing of certified products according to national and/or international standards
- Having experience in Food Safety Management Systems
- A person participating to an NGO as a member of management having knowledge about the scope of ETKO certification programs.

The ADC meets once in a year upon the invitation of Organic Certifier, and reviews the client files of which certification decisions have been taken by the Organic Certifier, to ensure that the compliance of the certification process to ETKO and accreditation rules are maintained.

The committee shall meet with minimum 3 members. The decisions taken are valid only at least when 3 members exist. In case presence of equality of the votes, presidents vote is considered as two votes. ETKO shall ensure that no single interest predominates. See TI 34 F 02 ADC Member List.

Minutes of meeting shall be recorded to ADC Meeting Note (TI 34 F 01) by a person assigned by ETKO and, approved by Chairperson and be communicated to OC and or other to take measures when and where necessary. The records shall be kept for 6 years.

12.8-Certifier 5.1.3.h

The Certifier has the ultimate authority and responsibility for the decisions related with the certification following an inspection conducted in accordance with ETKO requirements. Certifier is free from inspection and application processes.

The ultimate decision for the certification is given by the Certifier.

The Certifier reviews and verifies the files (of which all the inspection and related activities are completed) that the inspection process complies with ETKO rules.

The Certifier has the following authorities and responsibilities:

- No discrimination during the certification decision

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- Review the inspection files of the applicants whose inspections were completed and take decision about certification.
- Suspension, cancellation, withdrawing of the certificate.
- Review the conditions and procedures in relation to approval, maintenance, suspension, withdrawal of the certificate and making recommendations to ADC
- Monitoring the accreditation rules, legal and statutory requirements related with the certification processes, and making recommendations to AC.
- Taking necessary measures for the AC reports.
- Reviewing appeals, complaints and disputes

For NOP, the Organic Certifier has the additional authorities and responsibilities:

- Evaluating the inspection files and related documents and decide for the non-complying area.
- Raise notification of noncompliance (NN) for the non complying areas, based on the inspection reports
- Ensuring that NN is sent to applicant/client
- Evaluate the corrective actions and related evidences submitted by the applicant/client
- Closing out the NN, based on the evidences submitted by applicant/client and prepare notification of resolution of NN
- Ensuring the notification of resolution of NN is sent to applicant / client

The Organic Certifier has also the authority to report Managing Director and request corrective measures, if it can be demonstrated that the evaluation rules are consciously and/or continuously broken and or disregarded.

The Certifier is a person who is adequately qualified about the certification processes and independent of the evaluation processes. This ensures the impartiality and objectivity of the certification decisions.

The Certifier has the adequate experience and technical knowledge about the organic certification programs, applicable private certification programs, norms, regulations and accreditation rules:

- University education – agronomist
- Experience about the product and or system certification – at least 2 years.
- Knowledge of NOP, ISO 17065, COR, GOTS, EU Equivalency, Textile rules.
- License from Ministry of Agriculture

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- Knowledge about the specifics of the local textile and cosmetic industry

The Certifier can not work for another CB as long as he/she is employed by ETKO.

The Certifier is appointed by MD for 3 years duration which can be prolonged by the decision of MD.

12.9- Appeal Committee (APC) 5.1.3.I

APC is responsible for responsiveness to complaints and appeals. 5.1.3.I. APC members are authorized by the Managing Director officially by a letter when they are assigned. Same applies when resignation of a member from the committee Managing Director informs resigned member by an official letter indicating no longer assignment is given to resigned member.

Main purpose of Appeal Committee is

- To receive and evaluate the complaints from clients
- Dealing with clients appeals, complaints and disputes
- Providing solutions to appeals, disputes, and complaints.

Appeal Committee has the authority to grant the final decision in case of dispute, complaint or appeal in case they are not solved to the customer satisfaction by QM and or MD.

The chairman of Appeal Committee (APC) is the Managing Director. APC consists of 5 members including the chairman. The members are selected by chairman; service term is 3 years and can be extended with the approval of MD. Assignment agreement is extended automatically if there was no conflict of the member.

- Chairman
- Three members independent of ETKO (one shall be lawyer)
- QMR

The list of APC members are kept by MD.

The APC members are selected on the basis of their expertise on the field, subject processes, their ability to render a decision in an objective and impartial manner. No one of the members of APC shall have a direct interest in the organization raising the appeal. Under such circumstances that member is replaced. The list of APC members shall be provided to

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client in writing who shall has the right to reject any member on the basis of conflict of interest only.

The committee is formally invited for meeting by ETKO Managing Director, in case an appeal is accepted by the OC. The committee shall meet with minimum 5 members. The decisions taken are valid only at least 5 members exist. ETKO shall ensure that no single interest predominates.

APC members are provided with the report of QM on the subject and evidences provided by client, prior to the meeting. During the appeals meeting the client and Head Inspector have the right to present verbal evidences based on the documents or any other objective evidences submitted previously. Minutes of meeting is taken appropriately and maintained. APC has the right to call upon the services of experts in the relevant field. Such experts shall be independent of ETKO and client.

The appeals committee decides either TO ACCEPT or NOT TO ACCEPT the appeal.

The decision is taken by majority vote and it is unanimous. The decision is conveyed to Client by MD in writing.

Appeal Committee decision is final.

The records shall be kept for 6 years.

12.10-Office Manager

- Office management deals with daily operation needs such as stationary, kits, tools, food and drinks etc.
- Management of correspondance, postage, cargoes, telephones, computer systems etc..
- Completing the procedures for new personnel, preparing contracts, Col Disclosure reports.
- Preparing personnel files including qualifications, personal datas, diplomes, CV etc.

12.11-Accountant

- Capital activities, payments, taxes and insurance activities
- Record keeping related to accounting
- Participating to Board meetings
- Participating to Management Review and Internal audits incase needed.
- Preparing annual financial records
- Evaluating Staff performances including financial burden
- Financial analyses of the abroad offices
- Preparing offers/contracts

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12.12 Inspector and Lead Auditor, Inspection division:

Evaluation of the product to be certified is assigned to inspection division. 5.1.3.f. Inspection division is responsible for;

- Assistance to Application Dept. for application files review and reporting.
- Planning and performing the inspections and surveillances
- Preparing the reports
- Recommending for certification
- Training and qualification of inspectors

Inspector and Lead Auditor is responsible for

Evaluation of product certification will be done by the inspection department which consists auditors and lead auditors. 5.1.3.f.

Auditors must have qualifications for the specific programs they are assigned for auditing. In case a requirement official license must be available.

Univercity degree for the applicable scope– agriculture/food/veterinary/textile/chemistry etc.

- Certification programs experience minimum 2 years.
- Experience in auditing and/or implementation of NOP, TS EN ISO 17065, COR, GOTS, TE, IACB EU Equivalency Program, GAP and related standards / regulations.
- Related to Turkish regulations for organic and GAP programs official license issued by the Ministry of Agriculture.
- Experience and knowledge in local and international regulations for textile and cosmetics.
- Availability of Globalgap inspector and auditor qualifications according to GG Regulation Annex III.1 and Annex III.2.

Auditors are not allowed to work for other CBs for the same scopes as long as they are assigned by ETKO.

Auditors are assigned or dismissed by MD for a specific time period decided. Assignments are automatically prolonged unless otherwise a decision taken.

- Application package review.
- Planning and realizing audits / annual regular, surveillance, follow up, unannounced audits.

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- Preparing audit results and files for review
- Recommendation for certification
- When requested training, monitoring assisting for the new assigned auditors for qualification.

Responsibilities of the auditor and lead auditor

- To prepare files and forms for inspection
- To make inspection onsite and to fill inspection forms
- To take samples during the inspection
- To write inspection report
- To give the reports and inspection forms to assigned personnel for review. 5.1.3.g Assigned person can not be the same person who is in charge of the evaluation inspection..

12.12.1-Generic rules for inspector and lead auditors.

- Cannot talk about other licensees, problems, methods
- Inspectors cannot be intermediary person between two licensees
- Inspectors cannot be involved with any trade activity about organic products, which are certified by ETKO
- Inspectors cannot leave un-attendant their files, samples, or other documents to any licensees office, cars etc.
- Inspectors are responsible to keep all the documents confidentially and a safe place in his house, car, hotel etc.
- Inspectors are not allowed to advise to any licensee for any reason.
- Inspectors try to keep the time-schedule and inform concerned parties in time when changes occur
- Inspectors do not become too personal.
- Inspectors do not criticize other inspection bodies or Regulations.
- During taking serious decision inspectors keep calm, refer to the related regulation and are strict and reasonable.
- Inspectors elucidate the inspection forms clearly, ask for questions and have the forms signed before ending the inspection.
- Prepares the audit results and provide the audit files within 15 days after the audit. Auditor receives a warning incase 15 days rule not accomplished. In continuing cases auditor may be disqualified from his assignment.
- Performance evaluations are done by management to describe weaknesses and corrections of the weaknesses.

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- In case auditor enters in relationships violating confidentiality and conflict of interest rules then a warning will be issued, incase of continuity he will be disqualified from his assignment.

12.13-Office Assistant

- Preparing clients files before the audit and after the certification for archieving.
- Preparing the certificates as confirmed by the certifier
- Assisting Accounting department to follow up contracts
- Assisting office manager and application department

12.14- Application department responsible

- Customer relations, communication, correspondence with customer
- Marketing
- Sending Inspection Information forms and getting all technical feedback from customers to be certified, to prepare the offer
- Application review and formal feedback to customer
- Registration of database

12.15- Application department assistant

- Maintenance, classification, monitoring and control of customer files
- Control of files to be transferred to certifier and/or inspection devision
- Communication with customers in relation to contract files contents and certification issues.

For all personnel who deal with licensees and documentation, it is restricted:

- To make copies for his own use
- To give any information about any licensee to a third party person
- To give any decision without asking to responsible person, (as head inspector, director or quality manager)
- To take any paper, file, report, stamp or certificates outside the office without permit from responsible person.

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13-Recruitment & Competency 6.1.1.1-6.1.1.3, 6.1.2

ETKO provides its certification services by its own resources and, where necessary having assistance from external experts.

ETKO ensures that, the personnel in charge of certification activities whether its own or outsourced, are qualified and competent for the functions they perform. In case lack of experience is present with the new personnel ETKO ensures his qualification and getting enough experience in his specific scope of certification program before he is going out for auditing.

In the case ETKO extends activities to a new program and/or important changes occurs within the mentioned program ETKO ensures personnel involved with inspection and certification activities will be trained before starting activities of that related specific program.

Certification personnel perform their jobs in accordance to the relevant documented procedures and instructions which are updated as required.

The suitable personnel is recruited or subcontracted and formal training is provided in compliance with the referenced procedures

Relevant criteria is defined and documented, especially for the personnel in charge of evaluation and certification, to assure the competence of the personnel to perform their jobs effectively and uniform.

The recruitment (or subcontracting), qualification and assignments are carried out in accordance with these criteria.

Recruitment and competency requirements are managed according to SP 05 Recruitment and training procedure for ETKO employees. Competency requirement for auditors are managed according to GP 16 Requirement for Inspector Qualification Procedure.

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14-Customer Relations

14.1-Information flow

Referenced procedures for certification services covers all the up to date description of the evaluation-certification processes.

The guides related to ETKO certification services are published on the website www.etko.org Incase demanded these documents are provided to the applicants and/or operators.

This information is kept available to ETKO customers and updated as the system is amended. ETKO will inform the relevant parties before making the planned changes in the certification system. Information will be provided electronically via e-mail and announced on the website. The opinions of the parties will be directly taken about the planned changes. The decision to be taken will be informed to the partners electronically via e-mail and published in the website. The opinions of the suppliers and relevant parties related to the exact form of the changes and their effective days will be taken. The relevant parties will be asked to update their systems upon the effective dates in accordance with the changes to be made and these changes will be reviewed and verified during the follow-up inspections. 4.6

The information made formally available to customers during the initial contact of the applicant, before a contractual agreement is done, contains the following:

- Description of the evaluation procedures
- Description of the certification procedures
- The rights of the applicant and supplier
- The responsibility and duties of the applicant and supplier
- Documents needed for certification
- The fees, payments
- Responsibility and duties of ETKO

15-Evaluation, Review and Certification

15.1-The application and Contract 7.2, 7.3

ETKO prepares and sends a formal application form to the applicant together with the required information about evaluation-certification process, after having the initial contact with the applicant.

Upon the duly completion and authorization of the application form by the client:

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- ETKO reviews the application to ensure that the requirements are clearly defined and documented, that there is no points misunderstood, and ETKO has the capability to provide the specific certification service.
- Application pack is reviewed in order to describe if application is complete and the scope is correctly mentioned. 7.3. Incase the application made for a scope outside of ETKO accredited activities will be denied by explaining the reson in writing. In cases where ETKO has accreditation but does not have enough technical resources to realize the service, applicant will be informed in written explaining the reason.
- ETKO prepares an offer to be mutually signed by ETKO management and the applicant.
- Unless there is a formally documented application from the client, and a contract signed, ETKO does not proceed to evaluation process.

15.2-Providing Information and contract

Up to date detailed information about the certification process and procedures is provided to applicant on the website www.etko.org Incase demanded these documents are provided to clients before contract sign. This information includes the rights and duties of the parties, fees, the certification scheme and related requirements.

Contracting is done as per GP 01 Contracting Procedure. 4.1.2.1

15.3-Evaluation and Reporting ⁶

Evaluation of the product is carried out according to the ISO/IEC 17065 Standard and applicable regulations and private standards . ETKO may make use of external testing bodies in certain phases of evaluation process. Evaluation process is managed according to OP 01 Inspection Procedure.

The outcome of the evaluation is reported by the personnel in charge in a timely manner. A full report is brought to the notice of the applicant, identifying the nonconformities, if any and further evaluation and testing required.

Upon the report, the applicant is required to initiate remedial actions, within a specified time limit. If the applicant can show that remedial action has been taken in time, ETKO repeats the necessary parts of evaluation procedures.

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15.4-Granting the certification 7

Detailed information is provided for certification process within the applicable certification scope procedures.

The Certifier is authorized and responsible to review the overall evaluation process, reports, and any other information obtained, and consequently to grant the certificate.

The decision whether to grant the certificate is based on the outcome of the evaluation process. The authority for granting the certificate, maintaining, suspending, withdrawing of certification can not be subcontracted.

A formal certification document is provided to applicant, signed by an authorized officer of ETKO. Certification document includes detailed information about the identification of supplier, the certified product, referenced applicable standards as required.

15.5-Surveillance 7.9

Surveillance activities are carried out according to requirements of the certification standard to evaluate compliance of the certified product against the applicable standard. It can be announced and unannounced surveillance audits.

The supplier is required to inform ETKO for any intended change in the product, manufacturing process, or in quality system, if relevant, in a month period. ETKO determines if the changes necessitates further investigations.

If a surveillance visit is determined to be necessary by ETKO, the supplier is not allowed to release the product which is effected by such changes, until ETKO ended up with surveillance and notifies the supplier accordingly.

On the cases ETKO authorizes the continuing use of its mark on a product which has been evaluated, the marked product is periodically evaluated by ETKO to confirm that it continues to conform to the requirements.

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16-Use of License, Certificates and Mark of Conformity 4.1.3

License certificates, conformity marks granted by ETKO is subject to use under controlled conditions which are set by ETKO.

Incorrect use of licenses, certificates, conformity marks or incorrect reference to the certification system necessitates corrective actions to be taken by supplier.

Referenced ETKO procedure GP 11 [Use of Logo, Licenses and Mark of Conformity](#) applies for the use of licenses, certificates, conformity marks.

17-Complaints to Supplier 4.1.2.2.e

The performance of suppliers certified by ETKO, is monitored to see if the suppliers have any complaints from their own clients related with the certified products compliance to the requirements.

Suppliers keep records of all such complaints and take appropriate action for the complaints related with the requirements of certification.

The suppliers are requested to make available, the records of such complaints and remedial actions, to ETKO when requested.

18-Changes Management and Information Flow Effecting Certification

When the certification scheme introduces new or revised requirements that affect the client ETKO ensures these changes are communicated to all clients by website www.etko.org .
7.10.1

ETKO provides relevant regulations (including COR for applicants) and standards and the amendments to its clients.

The clients are informed on a timely manner, about the amendments in the certification system and the changes in the certification requirements. The amendments are valid on the date as informed to the client.

ETKO informs its clients about the amendments in the system and in its procedures formally in writing form or publishing in its website (On the website the links will be published for the program the client has applied for, i.e. COR).

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ETKO verifies the implementation of the changes by the clients. The client is responsible to implement the changes in the requirements as soon as he receives. 7.10.1

ETKO considers other changes affecting certification including changes initiated by the client and decide upon the appropriate action. 7.10.2

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 by checking activities and documents and affected products.

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.

Actions implement changes affecting certification includes following, if required: 7.10.3

- evaluation
- review
- decision
- issuance of revised formal certification documentation to extend or reduce the scope of certification; and/or
- issuance of certification documentation of revised surveillance activities (if surveillance is part of the certification scheme)

Actions are completed in accordance with Inspection (OP 01) and Certification procedures (GP 02).

Incase of exclusion any of the above activities (e.g. when a certification requirement that is not a product requirement changes and no evaluation, review or decision activities are necessary), necessary records shall include the rationale for excluding any of the above activities. (7.12)

The clients are informed about the amendments in the certification system, prior to change takes place. The participation of interested parties (clients, accreditation body, legal institutions...) is ensured for the nature of the changes and possible implementation date.

Following the changes in the system and notification to the clients, it is ensured that the clients take the action for proper implementation of the change on time as which is

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reasonable to ETKO, and its effectiveness are monitored in accordance with the relevant procedures.

Specific advice may be given the applicants but it is limited to explanations of the standards or certification requirements. The information is not offered for additional fees and providing any solution to the applicant is not allowed.

19-Certification fee 4.6.b

ETKO Fees are decided according to GP 07 Fees and TI 14 Fee Structure procedures. Fee Structure is published on the website www.etko.org

Fee Structure is maintained and updated according to the changes in certification programs and published on the website regularly.

Applicable fees for the client is described in an offer form and send to client for approval. Fees include travelling time and costs, time spend for inspection and certification evaluations as well as certification scopes decided. Following may be the effective componenets for the fee:

- Man/day fix fee,
- Application evaluation and planning of audit
- Preparing the audit results and reporting
- Regular surveillance or follow up audits related to non-conformities described
- Time spend for administration in the office, and related costs
- Issuing transaction certificates or any other similar documents after certification granted,
- Sampling and analyses done,
- Other official documents and recording on the obligatory database registrations.

There are rules for refundable and non-refundable fees as follows:

Conditions of nonrefundable fees:

To protect both sides from any mistake to be responsible for all losses which are not correct or deserved by the operator or ETKO; following procedure was developed for nonrefundable fees:

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Application: Fees for the first application and separate additional application for different processing or production locations, all fees paid.

The first payment of total annual fee in case the first inspection was planned and the licensee was informed inspection dates. The first payment is usually 1/3 of the annual inspection fee.

Inspection: If applicant wants to withdraw application, as a result of nonconformities were found during the inspection or document review, all fees paid.

If applicant wants to change the certification operation to another inspection body in the middle of the inspection season, all fees paid.

Certification: If cancellation, temporary or permanent suspension of certification of the operation was decided by ETKO, all fees paid.

Appeal: After an appeal process if a re-inspection and review or any other costs associated with this confirmation needed.

5.3.4. Conditions of refundable fees:

Applicant's complaint due to incomplete, inefficient services provided by ETKO, which is evaluated and approved by an independent mediator. Following fees are refundable:

Application: In case withdrawing of their application by the applicant who paid already prior to sending application documents, all fees paid.

Inspection: If ETKO does not provide necessary inspections on time, all fees paid.

Certification: If ETKO makes a mistake and finally certification decision was affected which result in difficulties and loss for client, all fees paid.

Appeal: In case an appeal process was on the side of the operator, all fees paid.

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20-Subcontracting 6.2.2

ETKO makes use of subcontractors in certain phases of certification process.

A subcontractor might be an external body or a person for testing or to perform inspections.

A formal contract is agreed upon and documented according to the referenced procedure, between ETKO and the subcontractor. Contract covers the confidentiality, conflict of interest and impartiality and other relevant matters.

ETKO maintains its responsibility for granting, maintaining, extending, suspending or withdrawing the certification, when subcontractors are used in the process.

Subcontractors of ETKO perform their job in accordance with the Quality System requirements of ETKO, and/or other relevant standards and guidance related to testing and inspection. Subcontractors are selected on the basis of their ability to meet the selection criteria of ETKO as documented in the referenced procedures. ETKO supervises the performance of its subcontractors to ensure the ongoing quality in their services.

The subcontractors are obliged to the rules governing the impartiality, conflict of interest and confidentiality as described in the referenced procedures.

A list indicating the approved subcontractors are maintained by Q&O Manager.

21-Internal Audit and Management Review

21.1-Internal Audits 8.6

Internal audits are conducted periodically to verify that ETKO quality system is implemented and effective.

The audit results are reported to the personnel responsible for the audited department. It is the responsibility of the audited department responsible, to initiate corrective actions for the nonconformities raised, if any, during the audit. The corrective actions are always taken in a timely and appropriate manner with regards to the nature of the nonconformity.

The corrective actions taken are verified for the proper implementation and effectiveness by the auditors. The audit results are reported to the relevant parties.

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Internal audits are conducted in accordance to SP 02 Internal Audit procedure

21.2-Management Review 8.5

ETKO executive management periodically reviews the quality system to ensure its suitability and effectiveness to meet ETKO policy and objectives and the requirements of accreditation rules and regulations under which ETKO operates.

Management Reviews are done in accordance to SP 03 Management Review procedure.

22-Appeals, Complaints 7.13, Corrective 8.7 and Preventive Actions 8.8

In case of complaint, appeal or dispute between ETKO and its clients the root cause is investigated in a timely manner, to ensure the satisfaction of the client end to secure the proper implementation of the ETKO quality system relative to the certification, and appropriate remedial actions are taken as given in the referenced procedure.

Appeals, complaints, corrective and preventive actions are managed according to GP 05 Appeal, Complaint and Dispute procedure.

Any nonconformity observed related with the ETKO quality system during the operations, or any other complaint from the clients are recorded by either the personnel in charge, or by the related inspectors and communicated to the QM. Further actions to eliminate the causes and to prevent the recurrence of the nonconformity are initiated by the QM as using SP 06 Non-conformity, Corrective & Preventive Action Procedure.

İtirazlar, şikâyetler, uygunsuzlukların ve ilgili düzeltici faaliyetlerin kayıtları Kalite Müdürü ve ilgili personel tarafından tutulur.

Records of appeals, disputes, complaints and related corrective actions are kept by the QM and related personnel in charge.

All the remedial actions are followed up to ensure their proper implementation and effectiveness, by QM or by a relevant personnel in charge.

Customer Satisfaction

ETKO monitor's also its client's satisfaction periodically according to SP 06 Non-conformity, Corrective & Preventive Action Procedure. The outcome of satisfaction survey is one of the major improvement opportunities to improve the certification process.

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1. PURPOSE

This procedure describes the method and responsibilities for the provision of inspection and **other** services from external resources

2. RESPONSIBILITES

MD, HI, OM are responsible for the proper implementation of this procedure.

3. RECORDS

GP 04 F01 Subcontractor agreement form
GP 04 F02 Contract for committee members

4. REFERENCES

SP 05 Recruitment and training
GP 08 Confidentiality & Conflict of Interest
GP 16 Inspector qualification

5. APPLICATION

5.1. Inspectors

Procedures SP 05, GP 16, GP 08 shall also be implemented when an external personnel is to be subcontracted as inspector.

The minimum criteria for the inspectors to be subcontracted are as follows:

- To have a recognized and accepted scientific/academic bachelor or master degree in relation to the areas he/she will be assigned.
- Working and having experience in one of the production or certification areas such as agriculture, agro food, veterinary, textile, chemistry or other related sectors for two years, and/or at least one year organic production and/or related works of product and system certification/standards practical experience,
- To have adequate information and experience in relation to the national organic production and processing control standards and procedures and when applicable other domain (for international projects relevant standards and procedures) or

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- To have successfully complete trainings provided by ETKO annually as internal inspector trainings, Ministry of Agriculture–ETO, and having the certificate. (For international projects the relevant trainings provided by ETKO or a national or international organizations)
- To have no barrier to traveling.

The agreement with the external inspector is done primarily by HI. Depending on the work load if needs arise for subcontracted inspector, HI informs OM. The applications are received by OM. The application documents shall include the evidences showing the compliance of the applicant to the a/m criteria. The application with missing documents/evidences shall be ignored.

The applications shall be evaluated by HI and OM and candidates shall be interviewed by HI and MD. Applicants for abroad projects in other countries will be evaluated by MD and/or if needed HI.

Subcontractor agreement (GP 04 F01) is prepared for the candidate and it is mutually signed.

Subcontracted personnel shall sign GP 08 F01 Confidentiality and Conflict of Interest agreement also.

Subcontracted personnel start as assistant inspector. Training, qualification and monitoring is done as per SP 05 and GP 16

5.2. Committee members

Committee members are selected and appointed as per terms of references given in QM. The qualification criteria are also given in related terms of references. GP 04 F 02 is used for committee members for contractual purpose.

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	APPEALS, COMPLAINTS and DISPUTES	DOC.NR	GP 05
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1. PURPOSE

This procedure describes the method and responsibilities to deal with appeals, complaints and disputes from clients under [ETKO certification programs](#).

2. RESPONSIBILITIES

QM and OM is responsible for the proper implementation of this procedure.

3. RECORDS

[GP 05 F 01 List of Appeal Committee Members](#)

4. REFERENCES

SP 06 Non-conformances, CA [and Preventive Actions](#) Procedure

5. APPLICATION [7.13](#)

ETKO implements this procedure to receive, evaluate and make decisions on complaints and appeals. ETKO records and track complaints and appeals, as well as actions undertaken to resolve them. [7.13.1. Complaints and appeals are recorded in Register of Sanctions, complaints and appeal form and followed by QMR and/or an assigned personnel.](#) All related documents are kept in a file opened for this specific case.

This procedure is kept available for the access of the interested bodies.

5.1 ACCEPTANCE OF APPEALS, COMPLAINTS AND DISPUTES.

- Complaint Receive and Evaluation**

Complaints are received through a variety of media including phone calls, letters, email, in person, or passed down from person to person. All persons submitting complaints are treated professionally, and their complaints are handled seriously. Complaining parties are requested and encouraged to submit complaints in writing, to be factual and detailed, and to sign their complaints. Most complaints are received by phone, obtaining pertinent, detailed information.

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Any client feedback in relation to the followings will be treated as complaint and action will be taken.

- The standard service provided by ETKO (satisfactory / unsatisfactory)
- Failure by ETKO to provide an agreed service
- Failure by ETKO to respond to a request for a service
- The attitude or conduct of an inspector has been unacceptable
- ETKO has not followed an agreed procedure
- Violation or inequitable application of the ETKO Quality System

Appeals, complaints and disputes are considered as application of the producer, processor and consumers to ETKO, State Officials and Accreditation body in respect of certified products, dissatisfaction with the service provided by ETKO, identifying an irregularity such as a quality parameter and/or fraudulent trade activities related to certified product within the scope of certification procedures. **First evaluation is done by QMR and MD and results are communicated by an official letter to the applicant whether it is related to certification activities for which are responsible.** 7.13.2. This letter is the acceptance of the complaint and appeal formally. 7.13.3. ETKO will be responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint or appeal to a decision. . **7.13.4**

Appeals are considered to arise with respect to decisions made by ETKO, on the following areas:

- Refusal of an application
- Failure to recommend certification
- Suspension, withdrawal, cancellation of a certificate
- Non acceptance of the scope of a Supplier, as applied
- Non acceptance of a NCR
- Detection of residues above the residue limits in products
- Doubt related to status of the product
- Doubt related to traders of the certified products
- Failure implementation by ETKO to the contract obligations which is signed.
- Complaints and Disputes of the ETKO certified operators clients
- Similar occurrences

5.1.1 Any client or party wishing to raise an appeal, complaint and dispute against a decision taken by ETKO, is expected to inform ETKO management about his intention, in writing to ETKO Managing Director or Quality Manager. Such an appeal complaint and dispute needs to be supported by all available evidence, by the client raising the appeal complaint and dispute.

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5.1.2 Upon receiving the appeal complaint and dispute, QM investigates the case, contacts with MD and when applicable relevant accreditation body and/or standard owner organization to solve the appeal. If the appeal is solved by QM/MD and or relevant standard owner organization and/ or accreditation body (AB), the Certifier is informed by QM, as appropriate.

5.1.3 If QM and/or MD, and relevant standard owner organization and/ or AB is unable to solve the appeal, complaint and dispute, then QM reports the case together with the evidences provided by client, to the Certifier.

5.1.4 The Certifier decides whether to accept or reject the appeal, complaint and dispute based on the evidences provided by client and QM report.

5.1.5 If the Certifier decides to reject the appeal, complaint and dispute (does not accept the client's claims...) Appeals Committee (APC) is established. The decision of the Certifier is conveyed to client in writing, and to relevant standard owner organization and/ or AB.

Maximum 4 weeks is allowed between receive of an appeal complaint and dispute in writing by QM and accepting or rejecting of the appeal, complaint and dispute by QM, the Certifier or relevant standard owner organization and/ or AB.

5.1.6 If the Certifier accepts the appeal, complaint and dispute the decision is taken at the discretion of the Certifier, in not more than 4 weeks duration.

5.1.7 In case of rejection of the appeal, complaint and dispute not more than 4 weeks is allowed between the decision of the Certifier and final decision of Appeals Committee.

5.2. Appeal Committee Function

APC is set for the purpose of the decision resolving the complaint or appeal made by, or reviewed and approved by, person(s) not involved in the certification activities related to the complaint or appeal. 7.13.5

5.2.1 The chairman of Appeal Committee (APC) is the management Director. APC is consisting of 5 members including the chairman. The members are selected by chairman:

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- Chairman
- Three members independent of ETKO (one shall be lawyer)
- QM

5.2.2 The APC members are selected on the basis of their expertise on the field, subject processes, their ability to render a decision in an objective and impartial manner. No one of the members of APC shall have a direct interest in the organization raising the appeal. Under such circumstances that member is replaced. The list of AC members shall be provided to client in writing who shall have the right to reject any member on the basis of conflict of interest only.

5.2.3 APC members are provided with the report of QM on the subject and evidences provided by client, prior to the AC meeting.

5.2.4 During the appeals meeting the client and head inspector has the right to present verbal evidences based on the documents or any other objective evidences submitted previously. Minutes of meeting is taken appropriately and maintained. APC has the right to call upon the services of experts in the relevant field. Such experts shall be independent of ETKO and the client. The appeals committee decides either TO ACCEPT or NOT TO ACCEPT the appeal.

5.2.5 The decision is taken by majority vote and it is unanimous. The decision is conveyed to Client by MD in writing.

5.2.6 Appeal Committee decision is final.

5.2.7 Whenever possible, ETKO gives formal notice of the outcome and end of the complaint and/or appeal process to the complainant and/or appellant. 7.13.7 - 7.13.8

5.3. Costs

Cost of the appeal, complaint and dispute is borne by ETKO if appeal, complaint and dispute is succeeds. Otherwise the cost is at the decision of ETKO if the client fails.

5.4 Corrective Action

Non-conformances and CA Procedure SP 06 is followed after the appeal, complaint and dispute if QM believes that corrective action is required. 7.13.9

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5.5 Confidentiality and preventing Conflict of Interest

Any document or any other evidence related with the appeals is strictly confidential.

ETKO shall not disclose any information or samples, materials, document to other parties, unless it is enforced by the law of the land and accreditation bodies.

All Members of APC signs relevant documents for confidentiality and conflict of interest, as described in GP 08 Confidentiality and Conflict of Interest procedure.

To ensure that there is no conflict of interest, the personnel including those acting in a managerial capacity who have provided consultancy for, or been employed by a client, is prevented from being used by ETKO to review or approve the resolution of a complaint or appeal for that client within two years following the end of the consultancy or employment.

7.13.6

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1. PURPOSE

This procedure describes the method and responsibilities for procurement of laboratory services.

2. RESPONSIBILITIES

HI and OM are responsible for the proper implementation of this procedure.

3. RECORDS

GP 06 F 01 Contract for Testing Services

GP 06 F 02 Subcontracted facility list

SP 05 F 08 Laboratory Performance Evaluation

4. REFERENCES

5. APPLICATION

5.1 Internal resources 6.2.1

When ETKO performs evaluation activities, either with its internal resources or with other resources under its direct control, ETKO will meet the applicable requirements of the relevant International Standards and, as specified by the certification scheme, of other documents.

For testing, ETKO will meet the applicable requirements of ISO/IEC 17025; and for inspection, ETKO will meet the applicable requirements of ISO/IEC 17020;

The impartiality requirements of the evaluation personnel stipulated in the relevant standard will always be applicable.

5.2 External resources (outsourcing) 6.2.2

ETKO will outsource evaluation activities only to bodies that meet the applicable requirements of the relevant International Standards and, as specified by the certification scheme, of other documents.

For testing, ETKO will meet the applicable requirements of ISO/IEC 17025;

For inspection, ETKO will meet the applicable requirements of ISO/IEC 17020;

The impartiality requirements of the evaluation personnel stipulated in the relevant standard will always be applicable. 6.2.2.1

Where evaluation activities are outsourced to non-independent bodies (e.g. client laboratories), ETKO will ensure that the evaluation activities are managed in a manner which provides confidence in the results, and that records are available to justify the confidence. 6.2.2.2.

ETKO will have a legally binding contract with the body that provides the outsourced service, including provisions for confidentiality and conflict of interest. 6.2.2.3

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ETKO will: 6.2.2.4

- a)-takes responsibility for all activities outsourced to another body;
- b)-ensures that the body that provides outsourced services, and the personnel that it uses, are not involved, either directly or through any other employer, in such a way that the credibility of the results could be compromised;
- c)-have documented policies, procedures and records for the qualification, assessing and monitoring of all bodies that provide outsourced services used for certification activities; SP 05 F 08 Laboratory performance evaluation form is used for assessment. Records are maintained in laboratory files.
- d)-maintains a list of approved providers of outsourced services; GP 06 F 02 Approved subcontractors list is maintained.
- e)-implements corrective actions for any breaches of the contract or other requirements in 6.2.2 of which it becomes aware;
- f)-informs the client in advance of outsourcing activities, in order to provide the client with an opportunity to object.

NOTE If the qualification, assessing and monitoring of the bodies that provide outsourced services are performed by other organizations (e.g. by accreditation bodies, peer assessment bodies or governmental authorities), ETKO can take this qualification and monitoring into account provided that:

- it is provided for within the scheme requirements;
- the scope is applicable to the work being undertaken;
- the validity of the qualification, assessing and monitoring arrangements is verified at a periodicity determined by ETKO.

The material to be tested is sent to testing body by courier, together with a document detailing the requested analyses. Samples are followed and verified by assigned personnel. The samples and communications and records related with shall be traceable to the project, licensee, and site as appropriate.

The contract with the testing body is done by MD. All the records of interaction with testing body shall be filed by assigned personnel for analyses..

General manager and/or another assigned personnel monitors the performance of the subcontracted laboratories on the basis of timeliness, maintenance of accreditation status, records quality for each service purchased. The results are recorded and kept in electronic media. Assigned person keeps the list of the subcontracted laboratories and reports the status of the laboratory to the management review at each cycle.

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	FEES PROCEDURE	DOC. NO	GP 07
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1. PURPOSE

This procedure describes how the fees for certification services are determined.

2. RESPONSIBILITIES

To apply this procedure is under the responsibility of the management.

3. RECORDS

4. REFERENCES

TI 14 FEES STRUCTURE

5. APPLICATION

5.1 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.

This fee structure has been developed to provide the applicant with a certification program that is responsive and cost effective.

A copy of the fee schedule is provided to persons inquiring about the application process.

5.2 Basic Annual Fee

For annual certification, the basic fee is designed as a single fixed cost based upon the size and characteristics of the operation seeking certification. This basic fee applies for a single applicant with a normally configured, contiguous, operation, which grows or processes a

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single product, or product group (e.g.: vegetables, fruits, grains, etc.). It is predicated upon the certification of an applicant whose records are in order; and for whom the inspection and sampling can precede unimpeded.

For both farming and processing operations, the basic fee includes:

- Initial application review and evaluation
- Initial third party inspection.
- Ongoing monitoring of required follow-up information

- An estimate of the applicant's basic annual fee for the certification of raw commodities is determined on the basis of acreage. A prospective applicant to estimate a probable basic annual fee may use the following schedule:

<u>Total Number of Hectares</u>	<u>Estimated Annual Fee (EURO)</u>
Less than 10	1.250
10-25	1.600
25-50	1.950
50-100	2.300
More than 100	per quote

- An estimate of an applicant's basic annual fee for the certification of processed products is determined on the basis of units produced. A prospective applicant to estimate a probable basic annual fee may use the following schedule:

<u>Total Number of Units Produced</u>	<u>Estimated Annual Fee (EURO)</u>
Less than 2.000	1.600
2.000 to 4.999	1.950
5.000 to 9.999	2.300
More than 10.000	per quote

Producer groups (ICS, internal control system required)

<u>Number of producers</u>	<u>Estimated Minimum Fee (EURO)</u>
50 <	1000
100 <	2000
200 <	3000

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300 <	4000
400 <	5000
400 >	per quote

Please Note: These fee estimates are provided for estimating purposes only, and do not constitute an offer of certification services by ETKO.

5.3 Total Fees

For larger farming areas, large and/or disbursed processing facilities, multiple cropping operations, multi product processing facilities, mixed conventional and organic operations and/or facilities, or other specialized circumstances, the total fee amount will vary depending upon the individual requirements needed to properly address the additional factors involved, and additional fee components required. Fees for these operations are quoted on an individual case basis.

Among those factors to be considered would be: (1) the number of producer and production fields, (2) the types and numbers of products involved; (3) the volumes of product involved; (4) the amount of time required to perform the third party inspections; (5) the amount of administrative time; (6) the amount of certification committee time required to review and evaluate the application materials; and (7) other special considerations such as additional sampling, terrain, remoteness of location, and necessary additional services

Upon acceptance of the application, an estimated total fee is prepared by ETKO and submitted to the applicant, along with the Certification Agreement, for approval before a commitment to proceed is made.

When ETKO decides for additional analyses of products for pesticide residues, GMO or any other tests for prohibited residues on products, the client **is not** responsible for the bearing costs .

5.3.1 Additional fee components, such as those itemized, are added to the basic annual fee on the basis of need for the respective component services. The resultant sum of the Basic Fee and this Additional Fee Component is the Total Estimated Annual Fee.

Additional Fee Components

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- Additional Administrative Time.
 - Additional Inspection Time.
 - Additional Sampling or Clerical Time.
 - Direct expenses (such as additional travel, lodging, communication, outside audit, etc.)
 - Unusual and/or Unforeseen Circumstances.
- (All additional fee components are subject to a 15 % administrative assessment.)

Some operations, such as those, which grow and/or process multiple products, can require additional fee components throughout the year in order to apply certification to all such products. ETKO's staff will be pleased to advise an applicant on its additional fee component status.

5.3.2 If a commodity seeking certification is packed, processed or stored off site (i.e. In location other than that from where it is grown; or in a facility under the care, custody and control of those other than applicant), a separate additional application and 100 EURO base application fee may be required for each such location. Additional inspection time also may be required. Circumstances of this nature are evaluated and reviewed with the applicant before a commitment is made.

In situations where these off site facilities have been certified by other acceptable certifying entities, such certifications may be honored by ETKO at no additional fee.

5.3.3 Conditions of nonrefundable fees:

To protect both sides from any mistake to be responsible for all losses which are not correct or deserved by the operator or ETKO; following procedure was developed for nonrefundable fees:

Application: Fees for the first application and separate additional application for different processing or production locations, all fees paid.

The first payment of total annual fee in case the first inspection was planned and the licensee was informed inspection dates. The first payment is usually 1/3 of the annual inspection fee.

Inspection: If applicant wants to withdraw application, as a result of nonconformities were found during the inspection or document review, all fees paid.

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If applicant wants to change the certification operation to another inspection body in the middle of the inspection season, all fees paid.

Certification: If cancellation, temporary or permanent suspension of certification of the operation was decided by ETKO, all fees paid.

Appeal: After an appeal process if a re-inspection and review or any other costs associated with this confirmation needed.

5.3.4. Conditions of refundable fees:

Applicant's complaint due to incomplete, inefficient services provided by ETKO, which is evaluated and approved by an independent mediator. Following fees are refundable:

Application: In case withdrawing of their application by the applicant who paid already prior to sending application documents, all fees paid.

Inspection: If ETKO does not provide necessary inspections on time, all fees paid.

Certification: If ETKO makes a mistake and finally certification decision was affected which result in difficulties and loss for client, all fees paid.

Appeal: In case an appeal process was on the side of the operator, all fees paid.

6.3 Application Fee:

At the beginning of the process applicants receive an application packet containing;

- Inspection Information Form,
- ETKO Leaflet,
- ETKO Certification services brochure
- Organic Production Regulations
- Fee schedule

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	CONFIDENTIALITY & CONFLICTS OF INTEREST	DOC. NO	GP 08
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1. PURPOSE

This procedure describes the responsibilities and method to assure the confidentiality, and prevent the conflict of interest in operations. .

2. RESPONSIBILITIES

OM and management team are responsible for the proper implementation of this procedure.

3. RECORDS

GP 08 F 01 Confidentiality & Conflict of Interest Agreement

4. REFERENCES

GP 04 Subcontracting procedure

5. APPLICATION

5.1 Confidentiality

- A production or handling operation is not certified if ETKO or a responsibly connected party of ETKO has or has held a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 24-month period prior to the application for certification;
- Any employee, inspector, contractor, or other personnel is not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected;
- Providing advice or consultancy services, is strictly forbidden, to certification applicants or certified operations for overcoming identified barriers to certification;
- 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 ETKO shall sign the Confidentiality & Conflict of Interest Agreement (GP 08 F 01)

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- ETKO management ensures 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 reconsiders a certified operation's application for certification and, if necessary, perform a new on-site inspection when it is determined, within 24 months of certifying the operation that any person, including contractors, participating in the certification process has or has had a conflict of interest involving the applicant.
- Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification.
- ETKO refers to a different accredited certifying agent for recertification and reimburse the operation for the cost of the recertification when it is determined that ETKO or a responsibly connected person had a conflict of interest involving the applicant at the time of application.
- ETKO consider itself having a conflict of interest if he/she holds or has held within 24 months prior to certification, a commercial interest (including immediate family interest) in the applicant's production or handling operation, or has provided consulting services to the applicant.
- ETKO refrains from making false or misleading claims about its accreditation status, about the accreditation programs of accreditation bodies for certifying agents, or the nature or qualities of products labeled as organically produced;
- ETKO furnishes reasonable security, in an amount and according to such terms as the law or applicable regulation requires, for the purpose of protecting the rights of production and handling operations certified by such certifying agent under the regulations.
- All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO

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- None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.
- All ETKO employees have to sign Col form for each year, including the committee members (ADC and APC), subcontracted inspectors, if any personnel of external bodies, or personnel acting on ETKO's behalf. For committee members Col arrangements, Quality Manual Section 3 applies also. These forms are kept by Quality and Office Manager in personnel files. 6.1.1.3
- ETKO shall not disclose any information or samples, materials, document to other parties without consent of the licensee unless it is enforced by the law of the land and accreditation bodies.
- **ETKO will** be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities. Except for information that the client makes publicly available, or when agreed between ETKO and the client (e.g. for the purpose of responding to complaints), all other information is considered proprietary information and shall be regarded as confidential. ETKO will inform the client, in advance, of the information it intends to place in the public domain. 4.5.1
- When ETKO is required by law or authorized by contractual arrangements to release confidential information, the client or person concerned shall, unless prohibited by law, be notified of the information provided. 4.5.2
- Information about the client obtained from sources other than the client (e.g. from the complainant or from regulators) will be treated as confidential. 4.5.3

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1. General

This document describes the procedure to be followed by ETKO and the activities to be realized by client in order to realize the evaluation and certification of the Organic Food, Feed, Textile, Cosmetics and other applicable processing activities of the client. Client having a certificate successfully in accordance with this procedure is approved for its production operations and is permitted to make use of relevant ETKO logo in its business.

Reference Standards to ETKO certification programs are following: 4.6.a

TC Organic Farming Regulation 27676/2010, ACB Standard "Equivalent European Organic Production and Processing Standard for Third Countries", Canadian Organic Regime "COR", BIOSUISSE regulations, ETKO Sustainable Textile program GOTS and TE, ETKO Sustainable Cosmetic program COSMOS, NATURLAND and other private standards when applied. Applicants can download these regulations and/or standards from ETKO website section standards www.etko.org. Textile standards are available in Textile Section and Cosmetic is available in Cosmetic section.

Client shall comply with the requirements stated in this procedure and other ETKO documents as well as relevant legal and statutory documents, and shall maintain all the records related with the production and processes in a satisfactory condition in order to receive and maintain the Certificate.

The scope of ETKO certification process is limited only to products and processes, which are directly controlled by the client. Certification process does not cover the systems in which the products are not produced by the client's own system and the processes not managed and controlled by client's own system.

ETKO clients shall:

- Comply with applicable standards and requirements.
- Establish, implement, and update annually an organic compliance plan;
- Permit on-site inspections with complete access to the production or handling operation, including no

certified production and handling areas, structures, and offices;

- make all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- make claims regarding certification only in respect of the scope for which certification has been granted;
- not use the product certification in such a manner as to bring ETKO into disrepute and does not make any statement regarding its product certification which ETKO may consider misleading or unauthorized;
- 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, Standard owner, and ETKO inspector access to such records during normal business hours for review and copying to determine compliance with the regulations;
- upon suspension or cancellation of certification, stop its use of all advertising matter that contains any reference thereto and returns any certification documents as required by ETKO ;
- use certification only to indicate that products are certified as being in conformity with specified standards;
- endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of ETKO
- Submit the applicable fees charged on time
- Immediately notify ETKO concerning any:
 - Application, including drift, of a prohibited substance to any 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.

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All applicants, upon request for certification, shall receive an application packet, which includes fee structures, a copy of the applicable standard(s), required documentation and other information deemed pertinent to certification.4.6.b

2. Application for certification and contract

The offer to submit to the client is prepared based on the information submitted by the client with the use of the certification program specific application forms. The client shall duly complete this form and submit the original copy to ETKO

ETKO shall prepare the offer in accordance with the information gathered from the application file and include all the required details related to the services to be provided, including the quotation.

In case the offer is accepted by the client, the client's authorized contact personnel shall sign necessary pages of the offer submit the original of the offer back to ETKO office. The client shall also submit an official document proving that the authorization of the personnel is valid. This offer, signed by the authorized personnel of the client shall be valid as a contract between ETKO and its client, and is accepted as an instruction to commence the certification process.

ETKO shall determine the schedule, after reviewing the documents available, for the activities to be followed.

The date for the initial inspection shall be determined mutually by ETKO and client. The periods and dates for the surveillance visits shall be determined by ETKO to ensure the compliance of the system and the maintenance of the certificate. The visit dates shall be informed to client at least two weeks before the inspection by ETKO.

2.1 Recertification of the products certified by other certification bodies

In case a certification decision is needed for a product coming from another source certified by other accredited certifiers relevant documents shall be provided to ETKO, by the client, before evaluation of the product.

- Valid accreditation letter of the certification body
- Inspection report of the project

- Master certificate of the project
- Transaction certificate of the product

ETKO accepts the certificates issued in accordance with the COSMOS, GOTS and/or TE where the products in the production chain are certified by other CBs which are COSMOS, GOTS and/or TE approved. The certificates and residue analyses reports issued by other CBs and laboratories are also accepted on the ground that they are in accordance with the COSMOS, GOTS and/or TE provisions. The certificates which are obviously not in accordance with the above mentioned standards are not accepted by ETKO

Inspection assignments are accepted regardless of whether they are for the entire processing chain or only parts thereof.

3. Documents required by ETKO for Application Package Review

Following the contracting, the client shall prepare an "Application Package" for the production systems and processes and submit it to ETKO in two weeks.

Unless these documents and the original copy of the contract are submitted to ETKO office, it is not possible to start with the inspection planning.

Application package review covers the information submitted in Application Form and other documents sent by client. The aim of this review is to determine the present status of the client's system; its compliance level to the requirements and to estimate if the field inspections will result in a certification at this phase.

At this phase ETKO may request additional information for missing points or for clarification of the data already submitted by client. A report shall be prepared by ETKO following the review and be sent to the client prior to the field inspection. The client is expected to take corrective measures, prior to the field inspection, if any.

4. Content of Application Package

- An organic compliance plan
- 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,

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and telephone number of the person authorized to act on the applicant's behalf

- 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 non-compliance or denial of certification issued to the applicant; and a description of the actions taken by the applicant to correct the non compliances noted in the notification of noncompliance, including evidence of such correction
- Other information necessary to determine compliance with the regulations
- **Applicant** must have documented policies and procedures for excluding products from organic sale, if test results are more than the tolerances of the applicable production regulations.

➤ **COSMOS Application procedures**

Information for operators

- COSMOS Specific; The users of the COSMOS Standard to comply with all relevant legislation, including the EU legislation for Cosmetic Products, EC directive 76/768/EEC & the EU REACH regulation and its amendments & other local or national laws where appropriate.
- ETKO will provide to operators an up-to-date description of the procedures to be applied for conducting certification. ETKO will inform operators about:
- contractual conditions, including fees and possible contractual penalties;
- the operator's rights and duties, including the appeals procedure;
- the current version of COSMOS-standard (and/or other harmonised standard) and corresponding relevant documents released by the COSMOS-standard AISBL;
- programme changes, including regular updates of procedures and standards;
- the evaluation and inspection procedures applied by ETKO in the course of certification; and
- documentation to be maintained by the operator to enable verification of compliance with the COSMOS-standard by ETKO.

➤ **For 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 and pest management strategies for the crops being produced;
- a production plan including all details used to calculate estimated yields and production.

➤ **For all post harvest facilities:**

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities is 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.

➤ **For textile processing facilities:**

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities such as ginneries, spinners, weavers is 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.
- Textile auxiliary agents and dyes
- Approvals by accredited certification bodies.

➤ **For textile input producers**

Application form and MSDS of the products to be approved for GOTS or COSMOS

5. Site Inspection

Prior to the site inspection an inspection plan shall be sent

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to client. The inspector in charge prepares plan. Plan includes the personnel in charge also.

In case the client has objection any one of the inspectors in charge, it is requested to inform ETKO management officially, together with the valid and objective proof. In case ETKO management agrees, the personnel shall be replaced.

During the site inspection the client shall :

- provide sufficient information to inspectors, proving that production processes comply with the relevant requirements.
- ensure the access to the facilities, records, personnel enabling the inspectors satisfactorily verify that organic production systems and processes are maintained.
- Cooperate resolving the nonconformity and initiating the corrective action.

The first site inspection shall be conducted according to ETKO procedures and cover the following:

- An opening meeting with the authorized personnel or management of the client. The scope shall be confirmed, reporting method and how to deal with nonconformities shall be discussed. Responsible personnel of client shall be ready in opening meeting. After the meeting a site visit should be done to evaluate following.
- Assessment of the production / processing system by means of visits to production facilities and storage units which may also include visits to non-organic production and/or processing areas if there is reason for doing so;
- Review of records and accounts in order to verify flow of goods (input/output reconciliation and tracing back) and on and off product statements.
- Review of records and accounts of the inputs used for production of agricultural crops. Technical activities such as fertilization, crop rotation, harvest, irrigation, pest-disease and weed management practices.
- GOTS Specific inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the

applicable criteria of the applicable standards.

- Identification of areas of risk to organic integrity;
- Inspection of the waste water (pre-) treatment system of wet processors.
- Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance.
- Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable).
- Verification that changes to the standards and to related requirements have been effectively implemented; and
- Verification that corrective actions have been taken.

After the site visit

- All the nonconformity, observations shall be discussed with client.
- All the findings shall be reported to client in the closing meeting.
- The inspection report shall be prepared and submitted to client.
- 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 regulation art.21.
- COSMOS Specific: Inspection of the ingredients, technology or process could pose a health or environmental risk, this will be checked thoroughly to avoid from non-allowed material and/or methods such as;
 - Nanomaterials
 - GMO sor derivatives of GMOs
 - Irradiation
 - Animal testing

- **COSMOS products under organic certification**

The product:

- must be labelled with the signature „COSMOS ORGANIC“ in conjunction with the seal of the

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COSMOS-standard AISBL member organization as detailed in the Labelling Guide

- must indicate on the label the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- must indicate organic ingredients and those made from organic raw materials in the INCI list. This should be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- may also indicate the percentage of organic origin ingredients by weight in the total product without water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

- **For products under natural certification**

The product:

- must be labelled with the signature „COSMOS NATURAL“in conjunction with the seal of the COSMOS-standard AISBL member organisation as detailed in the Labelling Guide
- must indicate organic ingredients and those made from organic raw materials only in the INCI list. This must be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- may indicate the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- may indicate the percentage of organic origin ingredients by weight in the total product without water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

Any claim relating to organic is not permitted, either ingredients or percentages, on the front of the packaging.

- **COSMOS Approval of ingredients**

For non-organic cosmetic ingredients to be approved as acceptable for use under COSMOS Standard, it is required to:

- supply all information and documents needed for the approval as requested by ETKO and
- declare to ETKO any changes to the processing of that ingredient that may affect its approval.

It is forbidden to label or otherwise indicate that approved cosmetic ingredients are certified according to COSMOS Standard.

- **Laboratory Analysis**

During the inspection the inspector may take samples to be sent to an ISO 17025 accredited laboratory for pesticide analysis. The sampling method will be followed according to ETKO’s OP 03 Testing procedure and TI 05 Sampling Method. The inspector certainly will take a sample in case of suspicion of the product inspected. Also the operator must maintain GMO free records for the seeds or for each additives that he intends to use for organic production. The operator is responsible to show the GMO Free documents to the ETKO inspector when asked upon. The ETKO inspector may take a sample from the organic seed to be analysed for GMO.

6. Corrective Actions

All the nonconformity found and reported during the inspection shall be cleared (major NCR) or planned to be cleared (minor NCR) and the effectiveness of the action taken by the client shall be verified by ETKO for issuing the Certificate.

There are three levels of corrective action to take by client:

- Corrective actions taken during the site inspection. If this is the case the action taken is verified by the inspector and the non-conformity report is closed and filed.
- CA related only with the documents. In this case client shall send the relevant evidences of the action taken together with the duly filled nonconformity report. The NCR and the evidence for the action taken is reviewed by the inspector and if found satisfactory NCR is closed and filed.
- In all other cases the inspector makes a follow up

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visit to the field again to verify the action taken and close the NCR (Major NCR) if the action is effective on date. In this case, the duration for this visit is charged to client. Follow up visits are not included in the contract, and will be invoiced to the operator.

The maximum permissible period for taking and verification of corrective action for Major Non-Conformities is 30 days and should be verified by ETKO. For Minor Non-Conformities corrective action plans are sent to ETKO within 30 days. In case the corrective action plans are approved by ETKO, their implementation is verified on next inspection visit. In case allowed time periods for corrective actions are exceeded, the complete certification process shall be renewed. In case of renewal, the costs shall be charged on the inspection fees which are valid on that date.

7. Use of Logo and Certificate 4.6.c

The certificate is issued only if the inspection is completed successfully and the fees are paid by the client. Certificate is valid through the issue date for a year, if none otherwise stated for specific programs.

TC 27676/2010, "Equivalent European Organic Production and Processing Standard for Third Countries EEUOPPSTC", COR and BIOSUISSE regulations and ETKO Sustainable Textile program GOTS and TE, COSMOS, GLOBALGAP and other private standards require the validity of the certificate as one year. According to NOP regulation validity of the certificate continues until surrendered, suspended or revoked.

The inspection realized for certification purposes does not preclude the client from its legal responsibilities.

In case production practices are related to NOP Final rule, certification process requires GP 18, for BIOSUISSE regulation GP 19, for COR regulation, GP 20. ETKO Textile, Cosmetics and other private standard certification programs requires Private Standards Certification GP 24.

The client has the right to demonstrate the certificate in his premises, in marketing or in any advertising media. The certificate shows the scope of the certification, the status of the products, identifying relevant statutory

requirements.

A guiding document is provided for client defining the rules to be followed in using the certificate and logo. The client shall send its logo samples to ETKO for approval prior to use. ETKO shall control the use of logo and certificate at its discretion and during the surveillance visits.

In case of improper use of certificate and/or logo, nonconformity is raised and client is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

Clients using processing inputs as a part of their organic textile processing whose input must be approved by ETKO otherwise may not be used for organic textile processing. The inputs must be approved by an authority or by ETKO to be used for organic textile processing. In case of improper use of inputs, nonconformity is raised and client is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

ETKO maintains a list demonstrating the certificated clients. The list is open for public information on the website www.etko.org

8. Maintenance of Approval for Certification.

Maintenance of certificate depends on the client's performance to comply with the relevant requirements of standards and statutory documents. ETKO shall ensure the compliance with planned surveillance visit.

Surveillance visit are planned during the initial inspection preferably and is informed to client two weeks before it is conducted.

The periods for surveillance inspections are determined during the initial inspection.

The client shall maintain compliance to relevant regulations requirements to ensure the maintenance of its certificate. NCR reported during the surveillance inspections will be evaluated according to paragraph. 5.5

9. Changes in the Client's System

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Client shall inform ETKO in case of change in the production system and processes (such as changes in location, additional units, name, shareholders, scope...) in time, formally in writing. ETKO shall evaluate the effect of the changes on the certification and determine if a special surveillance inspection is required or not.

In case it is determined that a special surveillance visit is required, until the special inspection visit is conducted, ETKO logo or any other document can not be used by the operator and none of the products can be labeled as organic. Operator will be informed by ETKO.

In case it is determined that a special surveillance visit is required the time planning will be done by ETKO inspection division, and charged to client on the fee stated in the contract following the visit.

In case there are changes limited to production system and not effective on certification, or if there are changes in documentation, these shall be subject to review in next inspection visit by the inspector.

NOTE: All the changes in the production and documents shall be kept by the client for the inspector to be a reference.

10. Suspension, Withdrawal and Cancellation of the Certificate.

ETKO reserves its right suspending, withdrawal, cancelling, or changing the scope of the certificate during the certification period.

Suspension, withdrawal, cancel is caused by the client:

- If the corrective actions are not taken as planned for the nonconformity found and reported, in a timely manner as mutually agreed by ETKO and client.
- Postponing the surveillance inspection
- Not complying with the requirements of relevant standards and statutory requirements.
- Misuse ETKO Logo and certificate
- Not complying to the contract between ETKO and client
- Acting in a way harming ETKO's prestige in the sector or aiming to act so.

- Not paid fees in due time

In such cases ETKO shall raise nonconformity report to client and request corrective action in an acceptable time period. If the client does not take corrective action on time ETKO shall suspend or withdraw or cancel the certificate; the client shall return the certificate back to ETKO as determined also by the contract.

ETKO makes public its decision about the client suspending, withdrawal, or cancelling the certificate. See www.etko.org

In cases the client itself decides to stop the certification by any reason during the certification period ETKO shall cancel the certificate.

11. Appeals and Complaints 4.6.d

In case client wishes to raise objections to any decision of ETKO about certification, or in case of a dispute between the parties the appeal or corrective actions procedures shall be followed. The client shall apply to ETKO management formally in writing. More information is available GP 05 Appeal, Complaints and Disputes Info Letter. See www.etko.org

12. Confidentiality

Except where national law or accreditation bodies require, ETKO shall keep confidential and shall not disclose to third parties the information about the client obtained during the contract and the certification process, unless the client permits in writing not to do so.

The supplier shall be informed of the information provided when required by the law and that all other times that information not be disclosed without consent of the supplier.

Client accepts the verification and inspection activities of the accreditation bodies by signing the contract with ETKO for certification services. No fee is charge for the inspection of accreditation bodies.

13. Postponing and Cancellation

In cases the field inspection is postponed before less than 2 weeks prior to the inspection date, ETKO charges %25 of total inspection fee to the client. This amount shall not be

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excluded from the total sum of original inspection fee.

In case the contract is cancelled by the client in any phase, ETKO shall charge to client %25 of the fees of the services not realized yet plus all the expenses incurred already for the services provided.

14. Legal Aspects

The contract for certification services is valid under the legislation of TR. In case of dispute, the parties shall apply to Izmir courts

15. Handling of Objections, Complaints and Legal Cases by Client

The client shall properly handle the objections, complaints, and legal cases received from its own clients. All the records related to such cases and relevant corrective actions shall be filed in an auditable manner and shall be kept open to the inspector during the inspections.

This file shall include the following:

- The statement of the nature of the received objections, complaints, and legal cases either by the client or as recorded by the client itself.
- The identity of the involved persons/groups that are in charge of the case solving and verifying.
- The statement of root cause of the problem
- The action taken or action plan to be taken
- Verification and documentation of the effectiveness of the initiated measures

16. Extension and Renewal of Certification

The operators are regularly re evaluated in order to verify that they maintain their system in compliance with the standard and that the corrective actions are implemented effectively. For the extension of the certification the operator is required to renew the contract and start the application process

For the reevaluation, a/m rules are applicable.

17. Exchange of Information

Where an operator is certified also by other Certification Bodies within the same scope, ETKO will seek information

exchange with the other Certification Bodies involved misuse of certificates.

ETKO may, if necessary exchange information with other Certification Bodies and/or authorities including GOTS, TE and COSMOS-standard AISBL to verify the authenticity of the information.

Where the operator and/or the subcontractors of that operator are checked by ETKO and a different control body, ETKO will exchange the relevant information on the operations under its control. 889-92-1.

Where ETKO operators and/or their subcontractors change their control body; the change will be notified without delay to the competent authority by ETKO. ETKO will hand over the relevant elements of the control file of the operator concerned and the reports and non conformities to the subsequent control body.

Incase ETKO accepts a new operator coming with non-conformities; ETKO will ensure that non-conformities noted in the report of the previous control body have been or are being addressed by the operator. 889-92-2. Where the operator withdraws from the control system, ETKO will without delay, inform the competent authority. 889-92-3.

Where ETKO finds irregularities or infringements affecting the organic status of products, ETKO will without delay inform the competent authority of the Member State concerned. That competent authority may require, on its own initiative, also any other information on irregularities or infringements.

In case of irregularities or infringements found with regard to products under the control of other control bodies/authorities, ETKO will also inform those authorities or bodies without delay. 889-92-4.

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	LABELING USE OF LOGO, LICENCES, CONFORMITY MARKS	DOC. NR	GP 11
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1. PURPOSE

ETKO exercises proper control over ownership, use and display of licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is certified according to this procedure. 4.1.3.1

2. RESPONSIBILITIES

Inspection division is responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

GP 18 NOP Certification Procedures
GP 23 Private Standards Certification

5. APPLICATION

5.1. Use of the ETKO Logo

ETKO has established its own logo.

- ETKO licensees (including importers) can use ETKO Logo for all the organic programs that ETKO offers
- Clients are not required to use ETKO logo on any product sold, labeled, or represented as organically produced as a condition of certification; and
- Clients are not required to comply with any production or handling practices other than those stated in the regulations in order to use ETKO's identifying mark.

ETKO's logo represents the integrity of its certified organic products. The use of this logo on ETKO certified organic products, in the form of a label mark, is an option that is available to interested certified parties upon the execution of a separate agreement.

After the certification decision has been taken by ETKO, ETKO will inform its operator that he can use the labels on his organic product(s).

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This label mark has been designed for the specific purpose of providing promotional identification of ETKO certified products. Products with a mark of ETKO show that the product so labeled has been certified organic to the uniformly high standards.

ETKO Logo may be used by the clients (operators including importers) with the permission of ETKO, for general labeling requirements which are applicable for raw, processed or finished products, in different sizes unless the proportion does not change.

1. ETKO Logo may be used on the packages and over products
2. ETKO Logo may be used compliance certificates

In the following cases ETKO logo cannot be used:

1. For the activities and addresses which are not in the certification program.
2. Infringement
3. For promotional tools such as pen, notebook, lighter etc

According to NOP Exception: ETKO certified production or handling operations within a State with more restrictive requirements, approved by NOP, shall require compliance with such requirements as a condition of use of its identifying mark by such operations. ETKO will accept only raw material or ingredients from other NOP accredited certifiers but will not allow these operators to use the ETKO mark, unless their products go through the ETKO application and review process.

5.1.1 Use of mark by non-certified brand owner (According to COR)

When under its own brand a company distributes products provided by a supplier to whom certification is granted by ETKO, this means that the company uses ETKO's mark to market these products. Thus even though the company itself possesses no certificate for its private brand products, ETKO shall require that the company:

- a) inscribe on the packaging of products being resold under a private brand, a reference to the certified product supplier, indicated such that the supplier may be identified by both the competent authority and ETKO concerned;
- b) maintain a registry of all certified products received from the supplier, distributed, and eventually sold under either one or more previously approved labels;

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c) accept that ETKO whose name is indicated on product labels be allowed to inspect these records when required and that records kept allow product movement to be traced, from the entry point (reports concerning products obtained from suppliers) up until a product leaves the premises (product sales reports and inventory reports).

5.1.2 Use of mark by sub licensee (According to COR)

Company producing a product exclusively for a company that holds the certificate in order to market it:

When a company does not hold a certificate but has an exclusive affiliation with the operator it supplies, and the operator holds the compliance certificate for the products being supplied, then the compliance mark will only be used on labels of those products it packages, in an exclusive manner for the supplier and on a site falling under its responsibility.

A company will inform officially ETKO about the identity of any other company for which it intends to manufacture products under license, and thus as a result can use the ETKO's mark (name and logo) on the label of the products that it intends to market under its own brand name even though it does not hold a compliance certificate for those products.

5.2 Labeling Requirements

Clients must meet the following criteria:

- The percentage statement of organic ingredients on the product package appears in letters that do not exceed one-half the size of the largest type on the panel on which the statement is displayed, and appears in its entirety in the same type size, style, and color without highlighting;
- Clients who produce the finished product maintain records verifying the organic certification of the operations of organic raw materials or organic ingredients; and
- Clients do not individually display ETKO seal or mark more prominently than the official seals such as USDA, COR.

According to COR: A company producing and marketing an ETKO certified product in addition to supplying to another company that holds a certificate in order to market it as well:

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When in a nonexclusive manner a company supplies a client that has obtained a certificate from a certifier for products being marketed under a private brand, and this company already holds for its products a certificate granted by another certifying body, ETKO's mark will only be used on labels placed on products prepared and packaged for this client, on a site falling under the company's responsibility, and as a result of an extension to the license granted to this client by ETKO.

According to NOP: Clients (operators including importers) who produce or handle products labeled "organic" shall denote each organic ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced.

Client (operators including importers) must have indicate, below the information identifying the handler or distributor of the product and proceeded by the statement, "Certified organic by ETKO ..," or a similar phrase, the name of the certifying agent that certified the handler of the finished product is identified.

Clients (operators including importers) may use the following terms;

- The term, "100 percent organic" or "organic," as applicable, as the name of the product is identified.
- For products labeled "organic," the percentage of organic ingredients in the product.
- The term, "organic," to identify the organic ingredients in multi-ingredient products labeled "100 percent organic."
- The USDA seal.
- The ETKO logo and identification of any other certifying agent which certified production or handling operations of raw organic product or organic ingredients used in the finished product.

The packages labeled "made with organic (specified ingredients or food group(s))" shall not display the USDA seal.

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)."

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- 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.

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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

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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
 - Certificate nr
 - Reference to organic, biological (bio), ecological (eco)
- Labeling of in conversion organic products according to TC Regulation requires following:

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- 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.

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For the abovementioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin.

The abovementioned "EU" or "non-EU" indication shall not appear in a color, size and style of lettering more prominent than the sales description of the product.

The indications referred to in paragraph above shall be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.

Organic production logos:

Community Organic production logo may be used in the labeling, presentation and advertising of products which satisfy the requirements set out under **IACB** Standard. The Community logo shall not be used in the case of in conversion products and food. In-conversion products of plant origin may bear the indication 'product under conversion to organic farming' provided that:

- (a) a conversion period of at least 12 months before the harvest has been complied with;
- (b) the indication shall appear in a color, size and style of lettering which is not more prominent than the sales description of the product, the entire indication shall have the same size of letters;
- (c) the product contains only one crop ingredient of agricultural origin;
- (d) the indication is linked to the code number of the control body

5.9 Private Standard Certification Schemes Logo Use

Private standards such as GOTS, TE, COSMOS or other similar ones apply to use their own logo as following the rules described by each different standard. GOTS described the logo use in its Labeling Guide. TE described as well how to use TE logos in its Standards. COSMOS Labeling and logo use is described in Cosmos Standard Labeling Guide.

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1. PURPOSE

This procedure describes the method and responsibilities to be followed for suspending, withdrawal, cancellation of the certificates and surrender of certification for organic certification program under ISO 17065 and COR

2. RESPONSIBILITIES

Managing director, Organic Certifier, and OM are responsible for the proper implementation of this procedure.

3. RECORDS

GP 15 F 05 Notification of Immediate Suspension / Revocation / Termination or Reduction

4. REFERENCES

GP 05 Appeal Disputes procedure
GP 10 Certification services
GP 11 Use of Logo and certificate...
OP 01 Inspection and Certification procedure

5. APPLICATION

When a nonconformity with certification requirements is substantiated, either as a result of surveillance or otherwise, ETKO will consider and decide upon the appropriate action. **7.11.1**

Appropriate action can include the following:

- a- continuation of certification under conditions specified by the certification body (e.g. increased surveillance);
- b- reduction in the scope of certification to remove nonconforming product variants;
- c- suspension of the certification pending remedial action by the client;
- d- withdrawal of the certification

When the appropriate action includes evaluation, review or a certification decision, the requirements of EVALUATION, REVIEW and CERTIFICATION procedures, respectively, will be fulfilled **7.11.2**

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COR Accredited certification: As per OPR (section 12(1)), suspension or cancellation is initiated in cases where the application is not submitted to ETKO within 12 months before the day on which the product is expected to be marketed

5.1. Sanctioning of Certification

Certification of an operation may be sanctioned depending on the severity of non-conformity identified. Sanction may include Suspension / Revocation / Reduction of certification. In case such issues arise ETKO will assign one or more persons to formulate and communicate the following to the client: **7.11.4**

- actions needed to end the sanction imposed and restore certification for the product(s) in accordance with the certification scheme;
- any other actions required by the certification scheme.

These persons will be competent in their knowledge and understanding of all aspects of the handling of sanctioned certifications.

Any evaluations, reviews or decisions needed to resolve the sanction imposed, or that are required by the certification scheme, will be completed in accordance with the ISO 17065 applicable parts of EVALUATION, REVIEW, CERTIFICATION DECISION, CERTIFICATE, SURVEILLANCE, and Exchange of information with related parties, public, authorities, other certifiers, scope standard owners. **7.11.5**

If payments are not made in a timely manner, and in accordance with the terms and conditions of the Certification Agreement, this procedure is followed, until the payments have a valid status.

Immediate Suspension / Revocation / Reduction of certification will be imposed on the certified operations which fail to implement corrective actions for the noncompliance within 30 calendar days or to resolve the issue through rebuttal or mediation, or to file an appeal, on time.

In case of Suspension / Revocation / Reduction, the certified operation is no longer able to sell, label, and represent the product as organic for the time period described. Once suspended /revoked / reduced, reinstatement for certification may only be requested from ETKO management and will only be considered for certification if the NCR(s) is (are)

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corrected and the operation has been inspected by ETKO to verify that the operation complies with the requirements.

ETKO will not send a notification of sanction to a certified operation that has requested mediation or filed an appeal, while final resolution of either is pending.

5.1.1 Reinstatement

A client whose certification has been sanctioned may at any time, unless otherwise stated in the notification of sanction, submit a request to ETKO 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 regulations. Depending on the nature of the nonconformities and the evidences submitted, ETKO may decide for a visit to the operation to close out the nonconformities for the reinstatement of the certification.

If certification is reinstated after sanctioning, ETKO will make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure all appropriate indications exist that the product continues to be certified. If a decision to reduce the scope of certification is made as a condition of reinstatement, ETKO will make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information. **7.11.6**

5.2 Revocation of Certification

Once the certification is suspended for a period of time, if during the suspension period the certified operation fails to make a request to ETKO for the reinstatement of the certification, ETKO Revokes the certification of the certified operator.

In case of withdrawal or suspension, the client shall cease to use the certification logo, certificate, documents by all means. Certificate and certification documents are returned back to ETKO. Such clients are informed to other CB's.

Sanctioning for reduction, suspension and/or revocation of the certification is applicable both to a certified operation as a single entity, or in group certification, to the group

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members as appropriate. In case of group certification, group member(s) not complying with the requirements may be suspended, and or revoked as appropriate.

In the event that a noncompliance has been detected **that affects only** a portion of an operation, a sanction can be issued to address to the certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

When a sanction related to Immediate Suspension / Revocation / Reduction issued following statements will be indicated:

1. The reasons for the proposed sanction;
2. The proposed effective date of such sanction;
3. The impact of a sanction on future eligibility for certification; and
4. The right to request mediation or to file an appeal.

5.3. Voluntary Withdrawal

Application: All applicants for certification have the prerogative to withdraw from this program, without prejudice.

- Clients may withdraw their application at any time;
- Clients will be held liable for the costs of services provided up to the time of withdrawal of the application.

In such cases applicants inform ETKO to leave the certification program and return any related documents to ETKO, on time. ETKO completes the procedures such as closing the files and reporting to the authorities as required, on a timely manner.

Note: If clients voluntarily withdraw their application prior to the issuance of a notification of denial of certification, they will not be issued notification of certification of denial.

Certification: If certification is terminated (by request of the client), suspended or withdrawn, ETKO will take actions specified by the certification scheme and will make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure it provides no indication that the product continues to be certified. If a scope of certification is reduced, ETKO will take actions

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specified by the certification scheme and will make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information. **7.11.3**

5.4 Surrender of certification

All certified entities have the prerogative to surrender their certification, without prejudice

- Clients may surrender their certification at any time and
- Clients will be held liable for the costs of services provided up to the time of Surrender of their certification

In case there is no annual updates from the certified clients on time, ETKO follows-up the certified clients at least one month before the following years surveillance audits if they continue certification or surrender their certification.

In case of surrender of certification, original certificate and all certification documents are returned back to ETKO and such clients are informed to the authorities as required. ETKO completes the procedures such as closing the file and reporting to the authorities as required.

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	REQUIREMENTS FOR INSPECTOR QUALIFICATION	DOC. NR	GP 16
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1. PURPOSE

This procedure describes the methods and relevant criteria to be followed to ensure the competency of the inspectors employed by ETKO.

2. RESPONSIBILITIES

The management (office manager, head inspector and MD and QM) is responsible for the implementation of this procedure.

3. RECORDS

4. REFERENCES

SP 05 Recruitment And Training Procedure

5. APPLICATION

This procedure is implemented by ETKO management following the new personnel recruitment or subcontracting an external source as inspector.

Candidates should be able to comply this procedure's requirements to be an approved inspector or subcontracted.

5.1. Inspector Qualification requirements

- **Inspector**
 - Educational Qualifications
 - Work experience
 - Courses/Certificates
 - Training.
- **Sub-Contracted Inspector**
 - Educational Qualifications
 - Work experience
 - Courses/Certificates
 - Training.
- **Specialist**
 - Training

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5.1.1 Inspector

- Educational Qualifications:
 - Academically qualified in a recognized scientific/technological discipline in relevant areas as appropriate (agriculture-food-veterinary, textile and chemistry, cosmetics and related subjects)
- Work experience as appropriate for the related certification program
 - A minimum of two years recent and relevant industrial (agriculture-food-veterinary, textile and chemistry or other related sectors) experience and/or at least one year organic production and/or related works of product and system certification/standards practical experience.
 - A competent working knowledge of nationally recognized organic production and handling system inspection standards and procedures.
 - For cosmetics : expertise in quality management issues, or at least 3 years professional experience in the cosmetics industry or appropriate field plus expertise in quality management issues, or at least 2 years professional experience in inspection and certification of cosmetics;
- Courses/Certificates
 - Satisfactorily completed a training course in organic production and handling system operation of related sector and inspection or
 - Nationally/Internationally recognized certificate by Ministry of Agriculture or other national or international organizations on related certification subjects.
 - Social criteria related audits requires Social Standard training provided by ETKO, other independent organizations.
 - Webinar trainings to be participated organized by GOTS regular bases
- Training
 - Attend ETKO inspections as an assistant inspector , this will include
 - Induction training by the head inspector (HI) or qualified inspector (i.e. one watching how it is done);
 - Participate as an assistant inspector on a minimum of ten units training inspections under the control and instruction of the head inspector or a qualified inspector. (e.g. solo visits do not apply). At the end of training inspections the qualified inspector or Head Inspector shall report on the trainees performance using the Inspectors Monitoring Report (SP05 F01)

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- The management (MD, Office Manager, QM and HI)) shall review the Inspector Monitoring Report (SP05 F01) before recommending the assistant inspector to become a qualified inspector. The Management may decide that further Inspector training is required, if so, after completion, another inspector monitoring shall be performed and reviewed by the Management.
- When the inspector is to be approved as a qualified inspector, part II of the Inspector Qualification Record (SP05 F02) (of the inspector to be qualified) is prepared by the head inspector and office manager.
- Inspection experience:
 - No other inspection experience is required besides the training experience.

5.1.2. Sub-Contract Inspector

- Educational Qualifications
 - Academically qualified in a recognized scientific/technological discipline in relevant areas as appropriate (agriculture-food-veterinary, textile and chemistry, cosmetics and related subjects)
- Work experience:
 - A minimum of two years recent and relevant industrial (agriculture-food-veterinary, textile and chemistry or other related sectors) experience and/or at least one year organic production and/or related works of product and system certification/standards practical experience.
 - A competent working knowledge of nationally recognized organic production and handling system inspection standards and procedures.
 - For cosmetics : expertise in quality management issues, or at least 3 years professional experience in the cosmetics industry or appropriate field plus expertise in quality management issues, or at least 2 years professional experience in inspection and certification of cosmetics;
- Courses/Certificates
 - Satisfactorily completed a training course in organic production and handling system operation of related sector and inspection or
 - Nationally/Internationally recognized certificate by Ministry of Agriculture or other national or international organizations on related certification subjects.
 - Social criteria related audits requires Social Standard training provided by ETKO, other independent organizations.

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- Webinar trainings to be participated organized by GOTS regular bases

If a subcontracted inspector provides the relevant documents and records proving is already approved as inspector by another certification body, then the following requirements apply:

- Training
 - Attend one ETKO inspection as an observer; this will include induction training by the ETKO Head Inspector. (i.e. one watching how it is done);
 - Participate as a team member in one inspection under the supervision of the ETKO Head Inspector or a qualified inspector. Their performance shall be recorded on an Inspectors Monitoring Report (SP05 F01)
 - The management shall review the inspector monitoring report before recommending the status of Inspector. The management may decide that further training inspections are required; if so after completion of these, another inspector monitoring shall be performed and reviewed by the management.
- When the inspector approved, an Inspector Qualification Report (SP05 F02) is prepared by HI and OM
 - ETKO shall not be responsible for any other training of ETKO Sub-contract staff, apart from times when the ETKO Quality Management System has radically changed.

5.1.3. Specialist

- Training
 - Specialists shall receive induction training before participating on their first ETKO audit. This training shall be directed primarily towards their role of supporting the inspection team and should be presented to ensure that the Specialist is fully aware of their responsibilities as defined in the ETKO Generic Job Description and requirements of a Specialist.
 - Social criteria related audits requires Social Standard training provided by ETKO, other independent organizations.
 - Webinar trainings to be participated organized by GOTS regular bases

ETKO will not be responsible for any other training

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	CERTIFICATION OF GROWER GROUPS	DOC. NR	OP 02
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1. PURPOSE

This procedure describes the method to be followed in the evaluation of grower groups organizations using internal controlling system.

2. RESPONSIBILITIES

HI is responsible for the proper implementation of this procedure

3. RECORDS

OP 02 F01 ICS Assessment

OP 02 F02 ICS Specification

OP 02 F03 Organic compliance plan – Grower group

4. REFERENCES

- NOSB Recommendation Adopted October 20, 2002 Criteria for Certification of Grower Groups
- Smallholder Group Certification Evaluation Protocol-IFOAM_December 2001
- EU Guidance Document AGRI/03-64290-00-00-EN
- OP 01 Inspection Procedure

5. APPLICATION

A-NOSB Recommendation Adopted October 20, 2002 Criteria for Certification of Grower Groups

B-IFOAM document and the records identified in, given in references shall be used in the evaluation of internal control systems of grower groups organizations.

C-EU Guidance Document AGRI/03-64290-00-00-EN in respect to the equivalency to EC 834/2007.

Evaluation phases are given below. Evaluation itself shall be made as applicable regulation requirements.

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5.1 Criteria for Certification of Grower Group Organization (GGO)

5.1.1 Verifying that the operator is a grower groups organization

Prior to the visit to operator's office, operator shall be evaluated as per related criteria below:

Grower group certification refers to the certification of a group of producers whose farms are uniform in most ways, and who are organized under one management and marketing system.

- In principle only small farmers can be members of the group covered by group certification. Larger farms (i.e. farms bearing an external certification cost that is lower than 2 % of their turnover) can also belong to the group but have to be inspected annually by the external inspection body. Processors and exporters can be part of the structure of the group, but have to be inspected annually by ETKO.
- The farmers of the group must apply similar production systems and the farms should be in geographical proximity.
- A group may be organized on itself, i.e. as a co-operative, or as a structured group of producers affiliated to a processor or an exporter.
- The group must be established formally, based on written agreements with its members. It shall have central management, established decision procedures and legal capacity.
- When intended for export, the marketing of the products must be carried out as a group.

5.1.2 Background:

It is defined "person" as "an individual, partnership, corporation, association, cooperative, or other entity."

Given the fact that the rule includes "cooperative" and "association" in the definition of "person", that it is a "person" who seeks organic certification, it can be concluded that grower groups, organized as cooperatives or associations, can seek certification as one operation under the organic production regulations.

Grower groups are different from other entities seeking certification in that they are comprised of numerous producers who are certified as one entity, rather than being certified as individual sole proprietors.

Historically, not all grower group members' farms are individually inspected by ETKO annually. The grower group shall have a quality system, or internal control system, in place to assure that all members of the group operate according to the system plan in compliance with the organic standard. The quality system of the grower group is inspected at least annually, but only a set

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percentage of the member operations are visited by ETKO. Individual site inspections are conducted primarily to validate the functioning of the quality system.

General requirements for certification:

“A person seeking to receive or maintain organic certification under Grower Group System;

- a) Comply with the applicable organic production and handling regulations;
- b) Establish, implement, and update annually an organic production or handling system plan that is submitted to ETKO.
- c) Permit on-site inspections with complete access to the production or handling operation, including non-certified production and handling areas, structures, and offices by ETKO.
- d) 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 organic program's governing State official, and ETKO access to such records during normal business hours for review and copying to determine compliance with the regulations.
- e) Submit the applicable fees charged by ETKO; and
- f) Immediately notify ETKO concerning any:
 1. Application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
 2. Change in a certified operation or any portion of a certified operation that may affect its compliance with the Act and the regulations in this part.”

5.2 Criteria for the Certification of Grower Groups

A grower group seeking certification is required to ensure the followings:

- The crops and farming practices of the producers shall be uniform and reflect a consistent process or methodology, using the same inputs.
- The group shall be managed as a legal entity under one central administration that is uniform and consistent.
- Participation in the group is limited to producers who sell all of their organic production through the group.
- Producers who are certified as part of a grower group do not possess individual certificates. Rather, the grower group is certified as a unit.

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- Grower groups shall establish and implement an internal control system (quality system), with supervision and documentation of production practices and inputs used at each producer's operation to insure compliance with the organic production regulations.
- Grower groups shall ensure that all members understand the regulations and how it applies to their specific operations.
- Grower groups shall utilize centralized processing, distribution, and marketing facilities and systems.

ETKO will decide how many growers must receive an annual inspection. It is important to know following issues to decide the number of growers for annual inspection;

- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity between the group's operations;
- The complexity of the group's production system(s); and
- The management structure of the group's internal control system.

5.3 Inspection of Grower Groups

- **Information provided.**

The first step of any grower group inspection is to review the material from ETKO to determine the scope of the project. Grower groups are often very complex. They may include hundreds if not thousands of producers. These types of operations do not easily fit normal inspection protocols. Therefore, much supplemental data is necessary in addition to normal certification documents.

The following is a list of information that ETKO shall provide to the inspector prior to the inspection, therefore it is vital that the project provide these documents and information to ETKO:

- General map indicating the general region of the production zone.
- A more detailed map indicating the location of each of the communities to be inspected.
- Grower lists by community, listing producers, producer codes or numbers, amount of land area under production by each producer, crops, estimated yields, and past production history. Many grower groups maintain individual producer records such as

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parcel maps and grower agreements which are generally reviewed at the time of inspection.

- Organic system plan, certification questionnaire, or application.
- Name of contact persons with phone numbers, both home and work. It is important to have access to at least two contacts in case the primary contact person cannot be reached.
- A description of the project to understand how it is organized. A previous inspection report should be provided for certification updates.
- Handling plans, questionnaires/applications, if there is any processing. (Many grower groups operate processing and/or storage facilities.)
- Information on final sales and distribution. This is important to determine if any off-site export or storage facilities need to be inspected.
- In the case of certification updates, the inspector should be provided with the past certification letter with all conditions for certification clearly stated. As indicated, the past inspection report can be extremely valuable, and should be reviewed.

5.3.1 Specific Guidance for the inspectors.

Review internal control documents.

The documents submitted by the operator shall be evaluated prior to the visit to operator's office. Specific emphasis shall be given to procedures related with internal control system and internal inspection reports. Internal inspections shall be done as per Organic compliance plan – Grower group (OP 02 F03) which is provided by ETKO to Grower Group.

Visit to the Office

Upon arrival at the inspection locale, meet with the management to plan the inspection itinerary. You should clearly understand the organizational management of the project prior to heading out into the field. You will need documentation of the internal control system to properly verify local oversight efforts, education programs, product flow, and production practices. It is advisable to review internal control documents and other records before heading out into the field. This information can help you choose where to focus your inspection site visits.

Select the sites to visit.

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Make sure that you have the freedom to select any part of the project for inspection. Do not allow the grower group manager to “direct” the inspection. Keep in mind that the further a group of producers are from the main office or the internal control system administrator, the weaker the control may be. Attempt to visit remote producers to best assess the system.

Interview grower group members.

Once the inspection begins, it is best to follow the product flow starting with the production sites, followed by primary processing, final processing, packaging, storage, and distribution. When visiting the producers, in addition to observing production practices and organic control points specific to the operation, the inspector must verify aspects critical to the overall project. Interview producers directly. Ask questions not only about their farms, but also about other project programs. How well does the producer understand what organic farming and certification means?

Ask direct questions.

It is also important to ask producers, point blank, "When was the last time you used agro-chemicals?" You may want to ask specifically if this includes urea or Roundup or other brand name products common to the area. Often producers in a remote area do not clearly understand that these substances are prohibited. Do not assume anything. Individual farm integrity usually reflects the producer's understanding of organic certification, which is directly linked to the project's educational and oversight efforts.

Risk evaluation

Determining the position of the operator as per organic agriculture requirements: low, medium or high. Complementary inspections shall be planned for medium and high risk levels.

Understand local issues

It is critical to understand the local culture, traditions, and common inputs. It is advantageous to invite a local inspector to accompany you. A local inspector can help build trust with producers and help you understand local issues. Such cooperative arrangements can help empower indigenous inspectors.

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Office audit

Once all aspects of the project have been inspected, a final visit to the project office will likely be required for an audit. The audit of the entire project is best done at the end of the inspection, when the inspector has a more thorough understanding of the entire operation. Additionally, it will most likely be necessary to verify different pieces of information gathered during the field inspection.

Exit interview

An exit interview with the project management is necessary in order to answer remaining questions. This gives the inspector a last chance to secure missing information, obtain required signatures, clarifying confusing, inconsistent, or inaccurate information, and communicate issues of concern such as:

- Briefing about the results of inspections, re inspections, complementary inspections (detailing the producers, sites...)
- Recommendations of the inspector, presentation of nonconformities, if any, and the related actions required.
- Policies and procedures to be followed for certification.

Complementary inspections.

In case a non-conformity is observed the inspector shall verify if the internal control system (ICS) also has the same observation.

IFOAM: Complementary inspections shall be made for medium and high risk level operators as per IFOAM annex A

5.4. The Internal Control System and Organic Control Points (OCPs)

- The internal control system of the group is a documented internal quality system that includes a contractual arrangement with each individual member of the group.
- Internal inspectors are designated by the group and carry out internal controls. They must receive suitable training. The internal quality system sets out rules to avoid or limit potential conflicts of interest of the internal inspectors.

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- The internal inspectors carry out at least one annual inspection visit to each individual operator including visits to fields and facilities.
- The internal control system keeps appropriate documentation including at least a description of the farms and the facilities, the production plans, the products harvested, the contractual arrangement with each individual member and internal inspection reports.
- The internal control system shall include the application of sanctions to individual members who do not comply with the production standards. It shall inform ETKO of the irregularities and non-compliances found, as well as of the corrective actions imposed with agreed time for completion.

5.4.1 Assessment of the internal control system.

The most critical component of both the grower group inspection and the grower group inspection report (provided by the Group) is the assessment of the internal control system. (A grower group inspection is in fact an evaluation of the internal control system.) The report provided by Group, will address the steps taken by the internal control system to enforce compliance with organic standards.

- Have the operators been provided copies of the standards in a language or format they understand?
- Does the internal control system use individual inspection reports to assess operator compliance? If not, how is compliance assessment documented?
- How often do official representatives of the control system visit each operation?
- What kinds of documents are generated to verify these visits?
- Are new operators inspected prior to being added to the GG?
- Have all grower group members signed a contract stating that they will comply with the organic standards and permit annual inspections?
- Are operators provided assistance to comply with the standards?
- What happens when non-compliance is suspected or detected?
- Are there records of the actions taken when non-compliance has been investigated?
- Does the control system have an official "sanctions" policy? If so, submit a copy with your report.

5.4.2 Reporting the inconsistencies

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It is important to clearly describe the consistency of the project from producer to producer. ETKO requires several documents to be prepared and provided to inspector prior to inspection. These documents cover lists of producers and production fields, indicating the history, rotation program of production, overview and detailed maps, agreements between GG and producers, internal self inspections, findings, harvest results, sanctions of ICS controls during the production season. ETKO will decide the number of producers to be inspected according to the risk levels of the project and issues mentioned above point 5.2.

Internal records should match ICS findings and the findings of the ETKO inspector. ICS findings must be present in the inspection report, along with any inconsistencies and unresolved issues. Removal of the individual producer is not necessarily the final answer. The situation may be an indication that the project is not providing proper oversight.

5.4.3. OCPs

It is very important to describe the organic control points of the overall operation, where loss of organic integrity may occur. The inspector shall report the preventative steps taken to protect organic products, and identify deficiencies where organic control points are not sufficiently addressed.

The following is a list of examples of **organic control points** encountered during grower group inspections:

- Unclear registers of grower group members.
- Unclear or inadequate maps.
- Inclusion of new fields or new producers with no conversion or documentation.
- Use of synthetic fertilizers - A producer may think that because he or she uses no herbicides or pesticides, the operation is organic.
- Use of used agrochemical bags or containers for harvested products.
- Contamination during storage or transport, e.g.: boats with gas and water in bilge, or storage under the house with gas and paint on top of product.
- Insufficient buffers or non-separation from other crops that have chemicals e.g.: cacao inter-planted with plantain, with urea used to fertilize the plantain.
- Inclusion of crops from neighbors or relatives who are not on the producer list.
- Intentional chemical use. "I only used a little bit."
- Shared use of backpack sprayers which are also used for applying prohibited materials.
- Unclear internal purchase and transaction records within the grower group.

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5.4.4 Processing by Grower Groups

Finally, grower group reports may include process inspection reports for all of the processes performed by the grower group. Grower group must submit a handling system plan, as applicable, and that the plan has been approved by ETKO. Follow handling inspection protocols and submit a handling inspection report.

5.5 Guidance for Reporting from Grower Group.

The grower group is required to submit its own inspection report which basically follows the outline for a farm inspection report. The reporting is done annually. However, sections may need to be expanded, added, or modified. For example, a section on Organizational Management is helpful to describe many aspects of the project. This section will describe the structure and assess the functioning of the internal control system. It should also list the names of communities, number of producers in each, hectares of each, and, if possible, estimated yields, with totals.

The following outline summarizes the areas which shall always be inspected in grower groups certification and also provides a list of the additional topics which are required to be covered in a grower group inspection report.

1. Background
2. Project headquarters and audit trail information; organization, accessibility, and accuracy of information; projected yields of products requested for certification
3. Organization management, internal control system, and compliance mechanisms, including records maintained
4. List of communities
5. Grower lists
6. All processing facilities, both on-farm and off-farm
7. Transportation systems
8. Storage facilities
9. Field conditions; inspector observations
10. Risk assessment; adjoining land uses; other organic control points
11. Inputs used
12. Equipment used
13. Packaging materials

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- 14. Producer interviews; inspector observations
- 15. Education program – producer understanding of organic principles and standards
- 16. Split operations - production of non-organic crops/products by grower group members
- 17. Other considerations
- 18. Summary
- 19. Attachments

(OCP) Organic compliance plan – Grower group (OP 02 F03) shall be taken into account by the Group for both its own internal inspection and inspection reporting.

5.6. Outline for Organization and Assessment of the Internal Control System (ICS)

5.6.1. Field officers

Field officers are employed by the grower group. They have mixed roles:

- a. Information/extension
- b. Registration of growers
- c. Internal control

On-farm research Field officers often become part of the community. Because field officers have internal control and education functions, they may have conflict of interest issues. This can be solved by rotation of field officers or field officers from other areas handling the internal control function. There should be a minimum of one field officer per maximum 500 farmers.

5.6.2. Principles of ICS

- a) analyses/description of situation
- b) appropriate, documented system
- c) awareness raising, information and instruction, contracting, verbal and written, social controls,
- d) monitoring, corrective actions, risk analyses

5.6.3. ICS documents

- a. Project description
 - 1. Basic project outline
 - 2. Farmer and farm profile, grower lists, site maps
 - 3. Farming practices

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4. Farmer support system
 5. Stakeholder analyses
 6. Risk-assessment
- b. The ICS itself
1. ICS personnel and the ICS officer
 2. Documentation & record keeping (forms)
 3. Monitoring and corrective actions
 4. The buying system arrangement
 5. Product storage and handling procedures
 6. Code numbering and product tracing
- c. Updating the system (annual report)
1. Compliance with standards
 2. Corrective actions undertaken
 3. Farm/project economy – financial report
 4. Update of documents

5.7. Evaluation of the Internal Control System (ICS) and Reporting

- ETKO evaluates the effectiveness of the internal control system, with the final aim to assess compliance with the production standards by all individual operators.
 - ETKO has a contractual agreement with the group
 - ETKO carries out at least one annual inspection of the group. The inspection shall include an inspection visit of a number of individual farms with the aim to inspect for compliance with the standards and to evaluate the effectiveness of the internal control system.
 - Each year ETKO defines and justifies a risk-orientated sample of farms subject to their annual inspections. The number of farms subject to annual external inspection is any case not be lower than 10. For a normal risk situation, minimum the square root of the number of farms in the group. For medium or high-risk situations, ETKO defines a risk factor of at least 1.2 to 1.4 respectively.
 - Larger farms, processors and exporters will be inspected annually by ETKO.
 - In case ETKO finds the internal control system to seriously lack reliability and effectiveness, ETKO will increase the number of farms subject to their annual inspection to at least three times the square root of the number of farms in the group.
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- The farms visited by ETKO will be predominantly different from one year to the other.

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Minimum number of farms to be inspected by ETKO			
Number of group members = n	Normal risk factor 1	Medium risk factor 1.2	High risk factor 1.4
Minimum	10	12	14
n	Square root of n	1.2 square root of n	1.4 square root of n

Factors to define the risk should include:

- a) factors related to the magnitude of the farms
 - size of the holdings
 - value of the products
 - difference in value between the organic and the conventional products
- b) factors related to the characteristics of the holdings
 - degree of similarity of the production systems and the crops within the group
 - risks for intermingling and/or contamination
- c) experience gained
 - number of years the group has functioned
 - number of new members registered yearly
 - nature of the problems encountered during controls in previous years and results of previous evaluations of the effectiveness of the internal control system
 - management of potential conflicts of interest of the internal inspectors
 - staff turnover.

The outline below contains further methodology for evaluation of the ICS by ETKO inspector:

a. At the ICS office

1. Review of the documented system (Is it sufficient for the current situation?)
2. File check to see whether system is being adhered to (Is office, are documents, is staff, is the system functioning?)
3. Review cases of farmer non-compliance
4. Identification of problem areas/risk assessment
5. Construct a plan for field visits:
 - Select some to get a general feeling, at random
 - Select some targeted at problems/risk areas and distant production sites

This work can be done in one day if the office and staff are well organized. The inspector Shall use a format/checklist/reporting form for this office work.

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b. In the field

1. Field visits

- Conduct some farm re-inspection visits
- Inspect some at random (can even be demonstration farm or village elders)
- Inspect some focused on the problem/risk areas
- Meet with community, second parties
- Evaluate social control mechanisms
- Meet with third parties

As soon as a non-compliance is detected, the inspector will want to determine whether the noncompliance is the odd exception or whether it is widespread.

c. Back in ICS office (exit interview)

1. Share evaluation of the field visits with field staff.
2. Identify OCPs and potential non-compliance issues.
3. Discuss strategies to address areas of non-compliance with management and field staff.

ICS Assessment form (OP 02 F01) and ICS Specification form (OP 02 F02) are used for recording the results of evaluation by the inspector.

The overall reporting shall be done in accordance with OP 01 procedure.

5.8 ETKO Sanction Policy for GGO

ETKO sanctions policy vis-à-vis groups apply in cases ETKO finds the internal control system to lack reliability and effectiveness. ETKO will apply sanctions to the group as a whole, including, in case of serious deficiencies, the withdrawal of the certification of the group.

ETKO will report the findings of the GGO audits to the relevant supervising authorities with the reference of all the elements of this procedure when required.

5.8.1 Disfunction of the ICS:

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ETKO Non conformity and corrective action procedures will be implemented incase any irregularities described during the GGO audits. Following points could be evidences that the ICS does not function properly.

- All the producers are not visited during the whole year by the internal inspector.
- No sanctions applied to producers who have violated the organic regulations
- Transparency of the grower group is absent
- Traceability is not in place
- Personnel used for internal control is not qualified
- Documents are not complete
- Producers do not have any idea of the organic regulations
- Producers lists not updated regularly

5.8.2 Decertification of Grower Groups

The Grower Group may be decertified if the following conditions happen:

- The grower group wants to quit producing organic
- None of the producers show compliance with the production plan
- (For countries where ICS is run) the ICS system is weak and not functioning properly

5.9. REQUIREMENTS FOR GROWER GROUP CERTIFICATION OF ORGANIC PRODUCT UNDER COR (new section)

• Requirements for Multi-site Organization

The multi-site operation composed of production units, sites, or facilities, shall be organized as a "person" according to Section 12 (1) of OPR. Pursuant to the section 2 of the Canada Agricultural Products Act, a person is defined as meaning "an individual, a corporation, an association or an organization."

The grower group may be organized on itself i.e. as a co-operative, or as a structured group of producers affiliated to a processor.

All members of the grower group shall apply similar production systems and must be in geographical proximity.

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The grower group must be established formally, based on written agreements with its members. It shall have central management, established decision procedures and be a legal entity.

The grower group must have in place an effective and documented internal control system.

The management of the grower group must sign a written contract with ETKO specifying the responsibilities of the grower group and of the internal control system. The management must obtain signed obligations from all grower group members to comply with the Canada Organic standard and to permit inspection by ETKO, IOAS or the CFIA.

The practices of the grower group operation must be uniform and reflect a consistent process or methodology, using the same inputs and processes.

Participation in the grower group shall be limited to those members who market their organic production only through the grower group, unless the member is individually certified.

Requirements for Internal Control System

The grower group must document and implement an Internal Control System (ICS), with supervision and documentation of production practices and inputs used at each sub-unit, and collected at each production unit, site, or facility to insure compliance with the Canada Organic Regime.

The internal control system must include a contractual arrangement with each member of the grower group.

The internal control system must be implemented by competent personnel and internal inspectors designated by the grower group shall carry out internal controls.

The internal inspectors must be suitable trained and ensure that potential conflicts of interest are limited.

The internal inspectors must carry out at least one annual inspection visit to each individual operator including visits to field and facilities.

The internal control system must contain appropriate records including:

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- production description, production and/or preparation specifications for products to which the application applies;
- maps, description of the farms and the facilities of all members;
- list of inputs (ingredients and agricultural substances);
- a copy of organic production and/or preparation plans;
- remedial actions required by the CB during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests;
- a complete list of group members.

The internal control system must have a mechanism to remove noncompliant group members from the list. All non-compliances as well as the corrective actions must be imposed with agreed time for completion, by ICS

- **Certification Process**

- **Initial Certification**

The effectiveness of the internal control system is evaluated by ETKO to assess compliance of all members with the requirements set out in CAN/CGSB 32.310 and CAN/CGSB 32.311.

The certification inspection of the grower group includes an assessment of the risks to organic integrity within the grower group and the environment in which it functions. A sample of all sites under the grower group's responsibility shall be subject to inspection visits by ETKO

The percentage of group members subject to the initial and the annual certification inspection is based on the results of a risk assessment. For normal risk situation, it is not be lower than the square root of the total number of units under the responsibility of the group. If the risk is higher than normal, the resulting number of the preceding formula is multiplied by 1.2, whereas with a high risk, it is multiplied by 1.4.

Factors to define the risk includes:

- factors related to the magnitude of the grower group
 - Organization size and sites' size
 - Value of the products
 - Numbers of years the grower group has functioned

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- Number of new members registered yearly
- Staff turnover
- The management structure of the internal control system
- factors related to the characteristics of the grower group
 - Variations in the product systems
 - Risks for intermingling and/or contamination
 - Geographical dispersion of the sites
 - Degree of uniformity among the production units, sites or facilities

ETKO assigns an inspector who have appropriate training on inspection of internal control systems. During the certification inspection the inspector determines whether:

- all internal control documentation is in place;
- internal inspections of all group members have been carried out annually
- new group members are only included after successful resolution of any non-compliances found during the internal inspection, according to the procedures agreed with the CB
- all non- compliances have been dealt with appropriately by the internal control system;
- Inspection records have been maintained by the internal control system.
- the new members are added the grower group in compliance with the procedures established by the GG.
- the list of GG members is current and all the members are recorded in the list.

The inspector carries out a witness audit to determine whether the inspections of the internal control system are conducted as written.

• **Maintenance of Certification**

Each year ETKO defines and justify a risk-based sample of members subject to annual inspection.

The members visited must be be predominantly different from one year to another. Some of the selection criteria of the sites being subject to visits may include:

- Results from internal control system inspection;

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- Complaint files;
- Significant variations of the sites' size;
- Modifications since the last certification.

The number of the annually inspected members is increased to at least three times the square root of the number of the members in the grower group in cases of high risk situations (e.g. ICS has issued lot of internal sanctions , a lot of new grower members).

The grower group must maintain an updated list of all members and inform ETKO in timely manner any time when changes to the status of the members occurs.

- **Records**

The grower group must have record-keeping protocols for the individual production units, sites, or facilities within a grower group.

ETKO maintains records of sample inspection to ensure that over time the inspections are representative of the grower group as a whole and take into account any previously identified risk.

- **Certification Documents**

The certification documents are provided to the grower group as a whole. Members within a grower group that has had its operations or product certified cannot not possess individual certificates unless that member has obtained its own certification independent from the grower group.

- **Suspension and Cancellation**

The grower group as a whole is responsible for compliance of all members.

In the event of noncompliance by the grower group or a member, procedure GP 15 applies as appropriate.

The certification granted to the grower group is suspended or cancelled as a whole, in accordance with Section 21 from the Organic Production Regulations, in cases where the grower group's internal control system fails to act on these non-compliances.

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	TESTING PROCEDURE	DOC NR	OP 03
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1. PURPOSE

This procedure explains testing methods applied to certified operators providing ongoing monitoring for compliance of the standards / regulations in any stage of the inspection and certification process.

2. RESPONSIBILITIES

To apply this procedure is under the responsibility of head inspector and inspectors.

3. RECORDS

OP 03 F 01 Sampling form
OP 03 F 02 Analyses results letter

4. REFERENCES

GP 06 Subcontracting procedure (service)
OP 01 Inspection procedure
TI 05 Sampling Method
TI 32 Risk Analyses Inspection Visits
TI 40 NOP Guide Testing & Enforcement Action

5. APPLICATION

5.1. Laboratory Testing

Extensive laboratory testing of crops, soils and processed products is an important part of the certification programs. Sampling procedures followed by the operator will be considered by **ETKO**, where as **ETKO** is free to do sampling and analyses for any product. When tests are realized by an approved laboratory **ETKO** may consider the results as valid. Sampling and tests will be done according to the organic production standards / regulations which are applicable. ETKO follows the sampling strategy to conduct laboratory tests considering the risk analyses realized for each certified operator.

Number, quantity, timing and method of sampling have direct effect on the results of the analyses, therefore to be considered critical parameters for the risk assessment. Packing material used, transporting and time required delivering the samples to the laboratory are integral part of the good sampling practice. Risk analyses realized according to TI 32. 889.92e.c.ii

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ETKO may require pre-harvest or postharvest testing of any agricultural input used in organic agricultural production or any agricultural product to be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." It is based on **ETKO** belief that an agricultural product or agricultural input has come into contact with one or more prohibited substances or has been produced using excluded methods.

For NOP ETKO does not have to conduct residue tests if **ETKO** has no reason to believe that there is a need for testing. **ETKO** will ensure, however, that certified organic operations are operating in accordance with the Act and the regulations set forth.

The "reason to believe" could be triggered by various situations, for example:

- (1) ETKO and/or the applicable authority receiving a formal, written complaint regarding the practices of a certified organic operation;
- (2) an open container of a prohibited substance found on the premises of a certified organic operation;
- (3) the proximity of a certified organic operation to a potential source of drift;
- (4) suspected soil contamination by historically persistent substances; or
- (5) the product from a certified organic operation being unaffected when neighboring fields or crops are infested with pests. These situations do not represent all of the possible occurrences that would trigger an investigation. Pre-harvest or postharvest residue testing will occur on a case-by-case basis.

5.2 Inspection and testing of agricultural product to be sold or labeled "organic"

Agricultural inputs or products and the conducting of pre-harvest and post harvest residue tests on the samples are subject to following procedures:

- All organic agricultural products **shall** be made accessible by certified operations for examination by **ETKO**.
- **ETKO** may **require** pre-harvest or post harvest testing of any agricultural **input** used or **organic product** when there is reason to believe that a **particular** agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. The tests **shall** be conducted by **ETKO** at its own expense.
- An inspector representing **ETKO** **shall** collect the pre-harvest or post harvest test samples.
 - Sample integrity **shall** be maintained throughout the chain of custody.
 - Residue testing **shall** be performed by accredited laboratory.
 - The results should be available to the public except for cases of compliance investigations.
 - For NOP EPA or FDA tolerances must be considered. FDA action levels for UREC (unavoidable residual environmental contamination) is used because they

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encompass many of the toxic, persistent chemicals and heavy metals that are present in the environment and may be found on food and animal feed.

- **Sampling and Sampling Record**

Sampling will be done according to Sampling Instruction TI 05 Sampling Method. Sample integrity will be maintained throughout the chain of custody, and residue testing will be performed in an accredited laboratory according to ISO 17025.

- **Sampling Record**

The sample taken is recorded on the OP 03 F 01 Sampling Form. The sampling form indicates:

- the licensee report number, licensee name and the licensee project number
- the unit number of the licensee, the name of the unit and the address
- the sample product's specification,
- sample weight,
- seal number
- the inspector's name
- the analyses required
- the name of the by stander (operator or its representative)

A copy of the sampling form is provided to the by stander (operator or its representative as a receipt.

5.3 Residue analyses:

The products evaluated against the requirements covered by the scope of certification and other requirements specified in the certification scheme. Laboratories used for testing must be accredited to ISO 17025 7.4.5

During the inspection, when necessary, samples are taken as per OP 03 and sent to laboratory testing.

Pesticide residue testing, combined with soil, water and plant tissue analysis, where appropriate, forms an integral part of the ETKO certification procedures. In the case of processed food products, the finished product and appropriate facility control points are also tested.

Within the recognized boundaries of analytical limitations, ETKO routinely performs on the raw and finished products and/or inputs the pesticide, GMO, Antibiotics, Heavy Metals,

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Dioxins, textile, sanitary and cosmetic specific chemicals or similar residue parameters depending on the production scope. Soil and water testing may be obligatory for certain production sites. For textile, sanitary, cosmetic and similar production facilities where environmental criteria are required, waste water analyses may be demanded according to the standard.

In addition to these routine basic tests, ETKO performs additional selective testing when circumstances and/or conditions deem such action to be appropriate. Most often these tests are selected from the broad range of either TC mandated testing procedures for hazardous waste chemicals and heavy metals, or from Health Department procedures for the identification of pathogens or other health hazards.

ETKO will take and analyze samples for detecting of products not authorized for organic production, for checking production techniques not in conformity with the organic production rules or for detecting possible contamination by products not authorized for organic production.

For IACB EU Equivalent program the number of samples to be taken and analyzed by ETKO every year shall correspond to at least 5 % of the number of operators under its control. The selection of the operators where samples have to be taken shall be based on the general evaluation of the risk of non- compliance with the organic production rules. This general evaluation shall take into account all stages of production, preparation and distribution.

ETKO will take and analyze samples in each case where the use of products or techniques not authorized for organic production is suspected. In such cases no minimum number of samples to be taken and analyzed will apply. Samples may also be taken and analyzed by ETKO in any other case for detecting of products not authorized for organic production, for checking production techniques not in conformity with the organic production rules or for detecting possible contamination by products not authorized for organic production. EC, 889/2008.65.2, IACB Standard.

Unannounced sampling, also an important part of analytical enforcement, is performed on both a random surveillance basis as well as on a compliance basis at the discretion of ETKO.

Commodities and processed products seeking ETKO certification are analyzed for the various substances which are described by ETKO. Substances to be analyzed will be decided according to the inspection results.

5.4 Soil testing for farming applicants includes

Baseline soil nutrient levels are required as an important means of monitoring the applicant's soil management plan; and as a means of providing valuable nutrient information

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to the applicant, and to the applicant's on going program of improving sustainability. For this reason **ETKO** may require soil tests from the operator, **ETKO** inspector may decide for soil test during the site audit.

5.5. Emergency pest or disease treatment.

When a prohibited substance is applied to a certified operation due to a Federal or State emergency pest or disease treatment program and the certified operation otherwise meets the requirements of this part, the certification status of the operation shall not be affected as a result of the application of the prohibited substance.

Any harvested crop or plant part to be harvested that has contact with a prohibited substance directly applied to the crop as the result of a Federal or State emergency pest or disease treatment program cannot be sold, labeled, or represented as organically produced.

Any potential drift from a mandatory pest and disease treatment program will be treated in the same manner as drift from any other source.

Products with detectable residues of prohibited substances that exceed 5 percent of the EPA tolerance for the specific residue or UREC (unavoidable residual environmental contamination) cannot be sold or labeled as organically produced. When such an agricultural crop is in violation of these requirements, the certification of that crop will be suspended for the period that the crop is in production

5.6 Test Results and exclusion from organic sale

When residue testing detects prohibited substances at levels that are greater than 5 percent of the EPA tolerance (for NOP certified products) and 0.01 mg/kg (for other standards and regulations) for the specific residue detected or unavoidable residual environmental contamination, the agricultural product shall not be sold, labeled, or represented as organically produced. **ETKO** may conduct an investigation audit for the certified operation to determine the cause of the prohibited substance.

- **ETKO** will provide all testing results to the State Official if residue levels of prohibited substances are found to be greater than described limits (for NOP 5% of EPA tolerances and 0.01 mg/kg for other standards and regulations) for the material. In addition, when required **ETKO** will notify appropriate State Officials for which the materials regulated level has been exceeded. Following steps will take place in order to comply with this directive.
- **ETKO** inspectors collect the pre-harvest or post harvest representative samples.
- Residue testing will be performed by accredited laboratory works in accordance with the methods described in the most current edition of the Official Methods of Analysis of the ISO 17025, OAC International or other current applicable validated methodology determining the presence of contaminants in agricultural products

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- **ETKO** will provide Residue test results and analyses to the owner of the certified organic operation whose product was tested. (205.403(e)(2),
- If residue exceeds described levels products will be disqualified
- Above mentioned limits (5 percent of EPA tolerance and 0.01 mg/kg) standard cannot be used to automatically qualify the products as organically produced, even if the level of chemical residues detected on a product is below mentioned standard levels for the respective prohibited substance.
- When residue testing detects the presence of any prohibited substance, whether above or below the mentioned level of the specific pesticide, **ETKO** may conduct an investigation of the certified organic operation to determine the cause of the prohibited substance.
- The same will occur if testing detects a product produced using excluded methods. If the investigation reveals that the presence of the prohibited substance or using excluded methods in a product intended to be sold as organically produced the certified organic operation shall be subject to suspension or revocation of its organic certification

TI 40 NOP Testing & Enforcement Actions procedure describes how ETKO deals with the residual incidents.

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	INSPECTION PLANNING	DOC.NR	OP 05
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1. PURPOSE

This procedure defines the method to be followed for the planning of inspection to achieve a high level of effectiveness on the field.

2. RESPONSIBILITIES

HI and inspectors are responsible for the proper implementation of this procedure.

3. RECORDS

OP 05 F 02 planned inspections form

OP 05 F 03 realized inspections form

OP 05 F 04 inspection plan

4. REFERENCES

OP 01 Inspection procedure

OP 04 Surveillance procedure

5. APPLICATION

5.1 Annual Inspection Planning.

ETKO prepares annual plan latest 31st March of each year for the evaluation activities to allow for the necessary arrangements to be managed for Certification activities. 7.4.1

Head inspector or assigned personnel prepares the planned inspection (form OP 05 F02) for the new season inspections latest 31st of March of each year, and the annual inspections are carried out according to this plan, as appropriate.

The planned inspection plan indicates the approximate time periods and inspection dates. This form provides an overall planning for the head inspector to follow up inspectors' inspection time schedule and time availability of the inspectors for other purposes.

(OP 05 F 02) provides detailed information about the inspections to be carried out and summarizes for each licensee the number of inspection days, addresses etc. And helps the head inspector to manage inspection activities and resources more efficiently.

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5.2. Inspection team

ETKO assigns personnel to perform each evaluation task which it undertakes with its internal resources. 7.4.2

The proper construction of each and every team of inspectors for the purposes of certification of organic production and handling system of a company is the most important element.

The inspector team is formed by personnel having qualifications and experience appropriate for the system to be certified. Each member of the inspection team is assured to meet the criteria given in GP 16 and additional knowledge for the field to certified, if necessary.

- All team members shall be registered on the inspector database.
- If an external specialist is being used because of the specific nature of the contract GP 04 and GP 16 shall apply.

For the inspector allocation to the inspections TI 06 Technical Codes are taken into account

5.3 Document review:

Application documents and/or old inspection documents shall be reviewed prior the agreed inspection date. The head inspector might delegate the review to another member of the team, but he remains responsible for the successful implementation of this task. During the review of application package the responsible person shall ensure that the documents

- are pertinent to national or international production standards or regulations applicable to the company and/or the product.
- state objectively whether the company production and documentation system acknowledge the requirements of the relevant regulation or standards.
- acknowledges the specific requirement for the handling of complaints.

The result of application package review is recorded on Application Package Review Form (GP 02 F01) and sent to applicants to take corrective actions, if any.

5.4. Planning of On Site Inspection

The followings are to be taken into consideration on the planning of onsite inspection, as appropriate. On the discretion of inspection team, the site where the inspection will be

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carried out may be visited to secure the quality of the operations.

1. Company structure and organization.

To ensure elements planned for inspections are representative of the company scope of production and handling processes. To understand the geographical and logistical realities of the company.

2. Company organic production & handling system plan, make-up and implementation of the system.

3. Allocation of time

The head inspector shall determine task allocation in relation to the inspector's previously defined technological skills and background to ensure optimum utilization of appropriately trained personnel.

The head inspector shall ensure adequate time is allowed in each area of the inspection and at the same time he shall ensure that all the elements of the regulations have been planned for inspection.

Special for the Canadian Organic Regulation: In cases where agricultural producers carry out split operations the Inspector assigned for the inspection must visually determine of what is being planted in all cultivated fields within the production unit. Inspections of split operations will be carried out during the inspection of the product (on field) where certification is seek for. In case of doubt of high risk contamination second inspection may be carried out during harvest period

4. Special conditions relevant to the company seeking inspection.

Specific, regulations/standards or requirements in force, these will be ascertained at an early stage by the ETKO team, in order to gauge compliance at the time of the inspection

Complex organizations present special situations to the inspector(s). It is thus important to ensure that these are identified in order to preclude potential audit limitations becoming a reality. For company's involved in the same process over many sites the situation is simple to cover, however the inspector is still required to ascertain local (site) activities and then make provisions for macro elements

5.4.1. Inspection plan

ETKO ensures all needed information and/or documentation is made available for performing the evaluation tasks by reviewing the documents provided by applicant. 7.4.3

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The output of the inspection planning process is a detailed plan specifying the essential requirements of the inspection. Task and time allocation shall also be specified in the resulting plan. The inspector in charge should prepare the plan. (OP 05 04)

The documented plan ensures the company is made fully aware of the inspection methodology and a thorough inspection of the production and handling system of the client to the specified requirements of the relevant standard, within the agreed time frame.

The inspector should have an overview of the company's operations. This is provided partly by the company's application package and the attachments that are requested in the application form and as per item 5.4.

5.5. Inspection files preparation

The inspector(s) shall be equipped with the following documentation and information prior to the performance of the inspection

- Inspection forms
- Last inspection report
- Relevant regulations and standards

5.6. Monitoring and Reporting of Inspections

Realized Inspection Form (OP 05 F03) is used by head inspector to monitor the inspections.

This form provides information on all activities of the inspectors and representatives in different regions or countries.

Head inspector monitors the activities of the inspectors and the result of the inspections by formal communications as described in relevant procedures and keep records as appropriate on form (OP 05 F 03)

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	CERTIFICATION STANDARDS	DOC.NR	OP 06
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1. PURPOSE

This procedure explains certification programs and the applicable official and private regulations or standards which ETKO uses during the Inspection and Certification process. ETKO is accredited according to ISO 17065 Standards.

2. RESPONSIBILITIES

To apply this procedure is under the responsibility of head inspector and certification committee.

3. RECORDS

4. REFERENCES

- TC Regulation 27676/2010
- Regulation of National Organic Program "NOP"
- IACB Equivalent EU organic production and processing standard for third countries
- GOTS Global Organic Textile Standard
- [CCS-OCS Content Claim Standards, Organic Content Standard](#)
- [COSMOS Standard](#)
- [BIOSUISSE procedure](#)
- COR Standards
- IFOAM Smallholder Group Certification
- ITU [and GLOBALGAP](#) Good Agriculture Practice Standards
- NATURLAND Standards

5. APPLICATION

5.1. Standards

ETKO certifies products from Organic Production Methods described by the Official and Private Standards established by the National and International Programs such as TC Organic Production Regulation, IACB Equivalent EU organic production and processing standard for third countries, NOP Final Rule, GOTS and [OCS](#) Organic Textile Standards, [COSMOS Cosmetics Standard](#), BIOSUISSE, COR, IFOAM Smallholder Group Certification, ITU and [GLOBALGAP](#) Good Agriculture Practices and NATURLAND Standards.

ETKO is responsible to provide applicable Regulations and amendments where applicable in the language of the client. In the interim, where prevailing regulations require a modification to ETKO's basic working policy, ETKO procedures have the flexibility to make the necessary adjustments to comply with the applicable regulations. ETKO management carries out of the necessary modifications of procedures and the quality management review.

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	DOCUMENTATION and CONTROL PROCEDURE	DOC.NR	SP 01
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1. PURPOSE

ETKO established this procedure to control the documents (internal and external) that relate to the fulfilment of ISO 17065 Standard. [8.3.1](#)

This procedure describes the method and responsibilities for the preparation, approval, issuing, update, and canceling of QMS documents.

2. RESPONSIBILITIES

QMR and all department heads are responsible for the proper implementation of this procedure.

3. RECORDS

SP 01 F 02 [Document update record form](#)

SP 01 F 03 Document master list

4. REFERENCES

5. Control of Documents: [8.3.2](#)

Following criteria is applied to implement this procedure which needed to:

- a) approve documents for adequacy prior to issue;
- b) review and update as necessary and re-approve documents;
- c) ensure that changes and the current revision status of documents are identified;
- d) ensure that relevant versions of applicable documents are available at points of use;
- e) ensure that documents remain legible and readily identifiable;
- f) ensure that documents of external origin are identified and their distribution controlled; and
- g) prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose

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5.1 Quality Manual

Quality manual (QMA) describes ETKO policy and objectives, quality system, organizational structure, responsibility and authorities.

QMA cannot be copied and unless permitted by QMR/MD cannot be distributed out of ETKO.

QMA is prepared by QMR and approved by MD.

In case of a change in a page of a section of QMA, the effected section is re-issued. The Updating Notes page of QMA indicates the revision status of the sections, last issue dates and revision numbers.

The change history of the sections and pages are recorded on Change Record Form (SP 01 F 02) each page of QMA sections also indicates the issue date and revision number.

The revised parts on pages are shown by **bold** or underlined characters.

Updated section and Updating Notes Pages of QMA is distributed **by electronic means** to users.

The original of QMA and its change records are kept by QMR.

Only the copies of QMA stamped as “**CONTROLLED**” can be used for distribution and only QMR is authorized to use the stamp and distribution.

5.2 Procedures and Forms.

➤ Procedures

The procedures are the documents defining how ETKO activities to be executed, the work flow, authorities and responsibilities, related records.

Procedures are coded after their group, with alphanumerical characters.

- General Procedures GP
- System Procedures SP
- Operational Procedures OP

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The procedures are documented using the format given hereunder

- caption
- purpose
- responsibilities
- Records
- References
- Application

The procedures are prepared by QMR in corporation with related departments. They are approved by MD and coded by QMR. The approved and coded procedure is distributed by QMR using [electronic media to the related personnel](#).

In case of updating in a page the procedure is re-issued. Change records are kept in Change Record Form (SP 01 F 02) by QMR.

The revised parts on pages are shown by [blue color](#), **bold** or underlined characters.

The issue and revision status of procedures are monitored in Document Master List (SP 01 F 03) by QMR. DML is updated as the procedures are revised and re-issued indicating the issue date and revision numbers. Procedures also indicate their issue date and revision numbers. [All documents present in the system is revised in every 2 years to harmonize with the standard requirements.](#)

[The updated procedures are stored by QM in ETKO system as printed or electronic media. Updates are informed to the related personnel by training and/or by electronic means or printed documents.](#)

Only the copies of procedures stamped as “**CONTROLLED**” can be used for distribution and only QMR is authorized to use the stamp and distribution.

The forms of a procedure are coded after its procedure code: F stands for form followed by serial number of form.

Sample: SP 01 F 01

All the current forms are recorded on Document Master List (SP 01 F 03) by QMR. As a form is revised, its status is indicated on DML and on itself following its code.

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5.3 Technical Instructions (TI)

These are the detailed documents describing how a job or work is to be done.

Instructions are coded using 4 digit alphanumerical characters.

Sample: TI 01

The forms originating from an instruction is coded in the same way of the form of a procedure.

Sample: TI 01 F01

The instructions are documented on standard pages in different formats as needed. In general procedural format is used where appropriate.

The instructions are prepared by QMR in corporation with related departments. They are approved by MD and coded by QMR. [The approved and coded instruction is distributed by QMR to the related personnel electronically.](#)

All the current instructions are recorded on DML by QMR.

The updating of instructions is the same as the procedures.

5.4. External Documents

[Documents of external origin will be identified and distributed as follows: 8.3.2.f](#)

The documents such as [ISO 17065](#), relevant guiding documents, national or international standards, legal or statutory requirements used in certification are recorded on DML and monitored by QMR. The current statuses of such documents are monitored utilizing internet, the official gazette, and publications of related standardization bodies. [ETKO assign personnel to deal with external documents to verify updated standards, documents in every 4th month. January, May, August. QMR will be responsible to register and control distribution of these documents on the DML "Document Master List.](#)

5.5. Validity of documents

[To prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose; following procedure is applied. 8.3.2. g](#)

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A document remains valid until an updating version is issued, or it is cancelled. In case of revision or cancellation, the user is responsible to dispose the obsolete document. [The records are retained for a period of time consistent with its contractual and legal obligations. Access to these records is kept consistent with the confidentiality arrangements 8.4.2.](#)

QMR keeps the original copies of all the obsolete documents, stamped as “**CANCELLED**”, together with change history records. [Electronic documents are kept electronically in OBSELETE file.](#)

5.6 Access to QMS documents

QMS documents are issued as outlined above but all QMS documentation is kept on server under ETKO_QMS folder and it is open for the access of ETKO personnel [assigned](#). The documents and the originals of record forms kept in server can only be modified by QMR and Quality @ Office manager, if mutually communicated and agreed upon. [Access to QMS is restricted to other personnel only QMR, OM and Certifier can access to the system.](#)

In principle the forms to be used to record the info obtained in the office or field activities are provided to personnel by Q&O manager; in case of need, it is permitted to take printouts of the forms from the ETKO_QMS folder.

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	INTERNAL AUDIT	DOC.NR	SP 02
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1. PURPOSE

This procedure describes the method and responsibilities for the planning, conducting and reporting of internal audits.

2. RESPONSIBILITIES

MD and QMR are responsible for the proper implementation of this procedure.

3. RECORDS

SP 02 F01 Annual audit plan
SP 02 F02 Audit detail plan
SP 02 F03 Audit report
SP 02 F 04 ISO 17065 Checklist

4. REFERENCES

5. APPLICATIONS

QMR shall plan, coordinate and execute the audit activities in order to verify the QMS effectiveness and initiate the corrective actions.

Internal Audit procedure is developed to verify that ISO 17065 Standard requirements are fulfilled and the management system is effectively implemented and maintained 8.6.1

An annual audit program planned, taking into consideration the importance of the processes and areas to be audited, as well as the results of previous audits. 8.6.2

Internal audits normally be performed at least once every 12 months or completed within a 12 month time frame for segmented (or rolling) internal audits. 8.6.3

Managing Director and QMR are responsible to reduce or restore the frequency of internal audits or the time frame in which internal audits shall be completed. These changes shall be based on the relative stability and ongoing effectiveness of the management system.

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Incase a decision is taken to change the frequency of internal audits or the time frame, records of decisions shall be completed and maintained, including the rationale for the change.

5.1 Audit team 8.6.4

QMR ensures the following:

- a) internal audits are conducted by personnel knowledgeable in certification, auditing and the requirements of ISO 17065 Standard;
- b) auditors do not audit their own work;
- c) personnel responsible for the area audited are informed of the outcome of the audit;
- d) any actions resulting from internal audits are taken in a timely and appropriate manner; and
- e) any opportunities for improvement are identified

5.2 Audit planning

QMR plans the audit annually in each January (Annual audit Plan SP 02 F01) and issues after approved by MD. While planning, the current status, importance of the departments and previous audit results are taken into account. Yet, at least once in a year whole departments are audited against the relevant QMS and ISO 17065 requirements. QMR shall determine the audit team while planning the audits.

5.3 Preparation

QMR shall prepare the Detailed Audit Plan (SP 02 F02) a month before the audit takes place, together with the department heads. (SP 02 F02) indicates the procedures, the departments to be audited, auditors, and it is communicated to audit team and departments.

During the audit, the audit team shall use ETKO Internal Audit Checklist and the relevant procedures.

5.4 Audit

The following documents constitutes the audit criteria

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- Quality manual
- General procedures
- System procedures
- Operational procedures
- Technical instructions

Audit begins with a short opening meeting briefing the department heads about the method to be followed and reviewing the detailed plan.

Department responsible shall be ready during the audit duration.

During audit, utilizing the check list the auditor shall check and ensure that the related documents are in place and implemented effectively by:

- Observing that related documents exist in place
- Auditee has adequate knowledge of documents contents
- Records are as the related documents describes
- Records are kept as per records procedure.

The non-complying areas observed during the audit shall be reported by the audit team on the Internal Audit Report (SP 02 F03).

5.5. Reporting the Audit Results

Audit report (SP 02 F03) provides information about the outcome of the audit.

Audit report shall be prepared by the team leader (if QMR does not lead the team). The NCR observed during the audit are clearly **identified and** recorded on the report **by the auditor**.

The audit report then is and submitted to QMR.

QMR shall examine the report, evaluate the nonconformities raised and distributes the report to the auditees for the implementation of corrective action plans.

Audit reports shall be completed and distributed in 2 days, following the audit completion date.

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5.6. Corrective Action

Corrective actions are handled with SP 06 Non-Conformity, Corrective and Preventive Actions Procedure.

A corrective action plan for the non complying areas shall be prepared by the auditee and submitted to QMR, immediately receive of the audit report. **Corrective actions must be appropriate to the impact of the problems encountered.**

The implementation of the corrective actions are verified for effectiveness by the auditor, in a timely manner. If found satisfactory, the nonconformity is closed and the result is recorded on the audit report. If not, a new target date is determined. If an NCR is not closed in second time it is conveyed to QMR /MD for proper action.

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	MANAGEMENT REVIEW	DOC.NR	SP 03
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1. PURPOSE

This procedure describes the method and responsibilities reviewing the suitability and effectiveness of QMS to our quality policy and objectives, to the requirements of ISO 17065.

2. RESPONSIBILITIES

MD and QMR are responsible for the proper implementation of this procedure.

3. RECORDS

Management review reports.

4. REFERENCES

5. APPLICATION

5.1 General 8.5.1.

ETKO management established this procedure to review management system at planned intervals to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfilment of ISO 17065 Standard. 8.5.1.1

Management review takes place **once** a year in December. MD, QMR and other responsible attend the review. **Alternatively, complete review broken up in to segments completed within a 12 month time frame as finalizing it latest December 31st of each year. Records of reviews are maintained in MR files.** 8.5.1.2

The aim of management review is to review the company policy and objectives, the suitability and effectiveness of QMS, past performance and accordingly to set new targets/objectives for coming months, determine improvement opportunities, and to determine corrective actions as appropriate. MD is the chairperson of review meeting.

The agenda of review meeting generally consists of policy/objectives, effectiveness of QMS, and requirements for changes in QMS and improvement opportunities.

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	MANAGEMENT REVIEW	DOC.NR	SP 03
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5.2 Management Review inputs: 8.5.2

The detailed agenda for QMS review shall consist of the followings:

- a) results of internal and external audits;
- b) feedback from clients and interested parties related to the fulfilment of this International Standard;
- c) feedback from the mechanism for safeguarding impartiality;
- d) the status of preventive and corrective actions;
- e) follow-up actions from previous management reviews;
- f) the fulfilment of objectives;
- g) changes that could affect the management system; and
- h) appeals and complaints

The attendees prepare their own reports about their activities as appropriate, if necessary, prior the review.

5.3 Management Review outputs 8.5.3

The outcome of review includes decisions and actions related to management review:

- a) improvement of the effectiveness of the management system and its processes;
- b) improvement related to the fulfilment of this ISO 17065; and
- c) resource needs

- Decisions about the improvement of QMS effectiveness
- Decisions about the activities related with certification process
- Resource requirements and planning.

The minutes of meeting shall be prepared by QMR indicating the decisions, action plans, responsible personnel and target dates as appropriate and distributed to the attendees.

Management review report is kept in accordance with Records Procedure.

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	RECORD CONTROL PROCEDURE	DOC.NR	SP 04
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1. PURPOSE

ETKO established this procedure to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of its records related to the fulfilment of ISO 17065 Standard. **8.4.1**

ETKO retains records to demonstrate that all certification process requirements (those in ISO 17065 Standard and those of the certification schemes) have been effectively fulfilled. **7.12.1**

2. RESPONSIBILITIES

MD, HI, QM&OM, QMR are responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

5. APPLICATION

All departments and personnel shall properly and regularly file and maintain the legal papers identified in QMS and records identified in QMS documentation. (This includes minutes of meetings also)

The following table provides information about the responsibilities and retention periods of the records according the QMS processes. The specific records for the processes are given in the relevant procedures.

Records shall be identified, indexed, filed and protected in an easily retrievable manner.

Storage, retrieval and disposition of the records.

5.1 Storage of Records:

ETKO keeps records confidential. Records are transported, transmitted and transferred in a way that ensures confidentiality is maintained. **7.12.2**

QM and/or OM copies the procedures, instructions, quality hand book, used forms, prepared reports, updated quality system documents and reports regarding the quality system to CD room or a secured hard disk on a regular basis, stores and maintains them.

Valid QMS documents are kept in QMS File as hard copy as CONTROLLED.

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Quality system documents and control reports in computer are transferred to a CD room or a secured hard disk monthly or a shorter period of time when required by QM or OM. When it is necessary, quality system information can be copied on a different period. In this case, reason shall be notified to QM.

When QM or OM is not available, personnel appointed by GM will be responsible for copying quality system documents and control reports. On the CD room or a secured hard disk, date of recording, and the name of the file shall be written.

Copied CDs shall be put into the Quality System CD box, incase hard disk is used this will be kept by QM or MD and will be protected from the access of unauthorized personnel and 3rd parties.

Copied CD room or secured hard disks will be kept for indefinite period.

5.2 Retention of Records:

ETKO established this procedure for retaining records for a period consistent with its contractual and legal obligations. Access to these records are consistent with the confidentiality arrangements. **8.4.2**

When the certification scheme involves complete re-evaluation of the product(s) within a determined cycle, records shall be retained at least for the current and the previous cycle. Otherwise, records are kept for 5 years of time. In defining retention times, legal circumstances and recognition arrangements are considered, incase legal retention times are longer, this period to be taken for retention. **7.12.3.**

5.3 Access to records:

Records related with certification shall be kept closed to the 3rd parties unless there is a legal requirement or a request from accreditation body. If this is the case these records are not accessible without the permission from QMR or MD

All personnel actively working at ETKO have full access to the procedures and forms (to have a general idea) in the system. But the responsibility of implementing each procedures are described at each procedure.

Only the MD (Managing Director) and OM (Office Manager) have access to the customer relation records, Subcontracting agreements, Conflict of interest and confidentiality agreements, Certification records and personnel files (such as personnel agreements, cv, etc..)

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Only the QM (Quality Manager) will have access to the appeals and complaint file(s) records, the documentation records, internal audit record(s) and nonconformity records in the system.

Only the MD (Managing Director) and QM (Quality Manager) will have access to the Management review file (minute) records and the financial status of ETKO.

Only the OM (Office Manager) will have access to the qualification and training file records of each personnel working or related with ETKO.

Only the HI (Head Inspector) have access to prepare the inspection plans of ETKO's inspectors.

Personnel will have no access to the file(s) records unless the file(s) records is related with their status. Personnel determined to have violated the access restrictions will be warned. In repetition of such a violation the person will be evaluated by the MD or OM.

Managing Director, Certifier, head inspector, assigned inspector and related advisory committee members for that year's project will have access to review the projects document and the record files. Incase demanded accreditation body and Ministry official will have access to those records.

Each personnel at ETKO will be notified or trained about the files to which he/she has access too. These will be shown at the yearly training plan.

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5.6 The period for file record is stated below at the table.

RECORDS	RESPONSIBLE DEPT. for MAINTENANCE	PERIOD	ACCESS AUTHORITY
Customer relations	MD, OM	3 yr	MD, OM
Subcontracting	MD, OM	Contract period	MD, OM
Appeals, complaints	QM	Continuous	QM
Conflict of interest and confidentiality	OM	Continuous	MD, OM
Personnel, qualification training	OM	Continuous	OM
Inspection planning, inspection, reporting	HI	5 yr	QM, HI
Internal audits	QM	Continuous	QM
Management review	QM	Continuous	MD, QM
Documentation	QM	Continuous	QM
Nonconformity & corrective actions	QM	Continuous	QM
Certification	OM	Continuous	MD, OM
Personnel files	OM	Continuous	MD, OM
ETKO Financial Information	MD, QM	Continuous	MD, QM

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1. PURPOSE

This procedure describes the method and responsibilities for the recruitment, qualification and training of the personnel in charge of evaluation and certification, and other staff

2. RESPONSIBILITIES

MD, QM&OM and Head Inspector are responsible for the proper implementation of this procedure.

3. RECORDS

SP 05 F 01 Inspector monitoring report
 SP 05 F 02 Inspector qualification record
 SP 05 F 03 Annual training plan
 SP 05 F 04 Training record
 SP 05 F 05 Inspector's control log
 SP 05 F 06 Personnel agreement
 SP 05 F 07 Personnel Evaluation
 SP 05 F 08 Laboratory performance evaluation

4. REFERENCES

GP 04 Subcontracting-personnel procedure
 GP 16 Requirements for inspector qualifications
 TI 19 Competency requirements for staff

5. APPLICATION

5.1 Personnel

ETKO employs, or have access to, a sufficient number of personnel to cover its operations related to the certification schemes and to the applicable standards and other normative documents. **6.1.1.1**

NOTE ETKO employs full time and part-time personnel. Both personnel oblige to work under contract that places them within the management control and systems/procedures of ETKO.

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ETKO provide internal trainings to qualify the personnel for the functions they perform, including making required technical judgments, defining policies and implementing them.

6.1.1.2

Personnel, including any committee members, personnel of external bodies, or personnel acting on the ETKO's behalf, keep confidential all information obtained or created during the performance of the certification activities, except as required by law or by the certification scheme. **6.1.1.3**

5.2 Management of competence for personnel involved in the certification process 6.1.2

By implementing this procedure ETKO; establish, implement and maintains this procedure for management of competencies of personnel involved in the certification process.

Therefore ETKO: **6.1.2.1**

- a-Determines the criteria for the competence of personnel for each function in the certification process taking into account the requirements of the schemes. (6.1.2.1a)
- b-Identifies training needs and provide, as necessary, training programs on certification processes, requirements, methodologies, activities and other relevant certification scheme requirements as explained in paragraph 5.8 of this procedure. (6.1.2.1b)
- c-demonstrates that the personnel have the required competencies for the duties and responsibilities they undertake as explained in paragraph 5.2 (6.1.2.1c)
- d-formally authorizes personnel for functions in the certification process by assignment letters. (6.1.2.1d)
- e-Monitors the performance of the personnel as explained in paragraph 5.6 and 5.7 (6.1.2.1e)

ETKO maintains the following records on the personnel involved in the certification process: **6.1.2.2**

- a)-name and address;
- b)-employer(s) and position held;
- c)-educational qualification and professional status;
- d)-experience and training;
- e)-the assessment of competence;
- f)-performance monitoring;
- g)-authorizations held within the certification body;
- h)-date of most recent updating of each record.

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5.3 Contract with the personnel 6.1.3

ETKO requires personnel involved in the certification process to sign a contract or other document by which they commit themselves to the following: Therefore SP 05 F 06 Personnel Agreement is signed;

a) to comply with the rules defined by ETKO, including those relating to confidentiality and independence from commercial and other interests;

b) to declare any prior and/or present association on their own part, or on the part of their employer, with:

- 1) a supplier or designer of products, or
- 2) a provider or developer of services, or
- 3) an operator or developer of processes to the evaluation or certification of which they are to be assigned;

c) to reveal any situation known to them that may present them or ETKO with a conflict of interest.

ETKO will use this information as input into identifying risks to impartiality raised by the activities of such personnel, or by the organizations that employ them.

Recruitment: MD, QM, HI coordinates the activities related to the selection and recruitment of new personnel.

Personnel are evaluated and selected during recruitment phase in accordance to the predetermined qualification criteria and competency requirements and then they are subject to ETKO training programs.

The new recruits shall sign the personnel agreement (SP 05 F 06), stating and accepting that they are independent of any relation with the applicant, product and processes to be certified, preventing impartial and objective decision making, and ensuring the confidentiality of the information obtained. This agreement is also binding for the annual payment of the personnel and for each inspection it constitutes a base for the services to be provided by inspector.

Employees other than inspectors shall be subject to the general training programs in relation with QMS and procedures as determined by department responsible.

All inspectors shall be subject to the **orientation and monitoring program** upon recruitment.

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Orientation and monitoring program includes the following at least:

- Getting acquainted with ETKO Quality Manual, procedures, instructions
- Certification program and procedures
- Training for inspection skills and application

New recruit inspector (subcontracted or not) is nominated as Assistant Inspector and shall complete the monitoring and orientation program listed in **Inspector Qualification Record** (SP 05 F02)

During the orientation, all the information received from employee during recruitment shall be verified.

The inspection skills of assistant inspectors shall be verified in the field by the head inspector or qualified inspector and their performances shall be recorded on Inspector Qualification Record (SP 05 F02) by the head inspector or qualified inspector in charge of monitoring.

Upon completion the **monitoring for 10 units positively, Inspector Qualification Record** (SP 05 F 02) is completed and assistant inspector is nominated as inspector.

To ensure and maintain the competencies of the inspectors their performances are monitored in the field and recorded on **Inspector Monitoring Report** (SP 05 F 01). The results obtained from monitoring reports and the feedbacks obtained from clients are used as inputs in determining the further training requirements.

In every two years period, inspectors shall be monitored by head inspector or a qualified inspector. The monitoring reports are submitted to QM&OM to be filed in personnel files. Monitoring activities provide valuable information about inspector's performances on the field. In case of a deviation in the performance of an inspectors is observed, monitoring shall be applied and reported in the first possible instance. In case an inspector is to be appointed as HI, the same applies.

During the whole year all the personnel involved at ETKO's activities are taken under monitoring. The **Personnel Evaluation Form** (SP 05 F 07) is filled in by the Quality Manager or Office Manager to ensure the progress or the performance of the personnel involved at ETKO's activities. This form will be approved by the quality manager and the general director. The forms (SP 05 F 07) filled in for all the ETKO personnel will be lately send to the authorities when required. The feedback of the evaluation forms will be used as an input to progress the person at its weak aspects.

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ETKO ensures through regular trainings indicated in **Annual Training Plan** (SP 05 F 03) that personnel involved in certification (i.e. inspectors and other certification personnel, including member(s) of committees) have and continue to have up-to-date technical knowledge in their respective fields of activity to enable them to conduct evaluation and certification effectively and uniformly.

Annual Training Plan (SP 05 F 03) is prepared and implemented by HI, QM&OM taking into account the information obtained from monitoring activities, complaints, changes in QMS, new products, new standards etc. Training plan indicates the time plans, subjects, trainers and training methods. Training may be in the form of meetings, messages, online and seminars/courses.

QM&OM is responsible for organization of the training activities as shown on training plan.

The effectiveness of the trainings provided are evaluated during the monitoring and recorded on Inspector Monitoring Report (SP 05 F 01)

The trainings provided to personnel are recorded to **Training Record Form** (SP 05 F04) by QM&OM and filed in their personal files.

All inspectors shall record their all assignments on **Inspectors Log** (SP 05 F 05) providing information about their activities and experiences on the field.

In-house training to the personnel will be evaluated and filed with the training files. This will be done to follow up effectiveness of the training.

5.6 Committees

Committees are formed by personnel who are competent and having appropriate technical knowledge in their fields as it is stated in the related procedures and terms of references.

Performance of committee members are monitored by MD on their attendances on the meetings and the role they play during the meetings. No single interest shall predominate and members shall be independent of the cases.

5.7 Back up personnel

Performance of backup personnel is monitored by MD and QM and, is subject to evaluation once a year. The general criteria for the evaluation include:

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- The complaints received which are relevant to staff
- The issues (i.e number and frequency of mistakes) observed (not the nonconformities observed in internal audit) during performing their duties.
- Their participation to improve the quality of our services
- Loyalty
- Obedience to conflict of interest and confidentiality rules
- Adherence to the requirements of QMS.

The training plans are prepared and implemented as needed by the performance evaluation of staff, besides other precautionary measures (i.e repositioning, ending contract...)

5.8 Laboratory evaluation

In order to follow up effectiveness of the laboratories annual performance evaluation is done.

This is important to control quality of the Products to be marketed under ETKO Certification compliance with the applicable regulations.

Products with high risk contamination need to be analyzed and results should be reliable.

Laboratories should be able to provide English and Turkish analyses reports.

Performance evaluation is to be done with the form SP 05 F 08

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	NONCONFORMITY, CORRECTIVE & PREVENTIVE ACTIONS PROCEDURE	DOC.NR	SP 06
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1. PURPOSE

This procedure describes the method to identify, record the corrective and preventive actions of QS and to assign responsibilities for initiating, requesting, implementing, and verifying the effectiveness of corrective and preventative actions.

This procedure applies to preventing and correcting nonconformities related to resources, certification programs, completed services, operational processes, and the quality system.

ETKO established this procedure for identification and management of nonconformities in its operations. **8.7.1**

ETKO also, where necessary, takes actions to eliminate the causes of nonconformities in order to prevent recurrence. **8.7.2**

Corrective actions will be appropriate to the impact of the problems encountered. **8.7.3**

2. ROLES and RESPONSIBILITIES

QM and all personnel are responsible for proper implementation of this procedure.

Roles – Title of Responsible Personnel Görevler - Sorumlular	Responsibilities Sorumluluklar
Chief Operating Officer (COO) Yürütme Yöneticisi Genel Müdür GM	Approving and allocating company resources to ensure all preventative and corrective actions, when necessary, are carried out throughout ETKO. Gerektiğinde ETKO'nun bütün departmanlarını kapsayacak şekilde düzeltici ve önleyici faaliyetlerin yürütülmesini sağlayacak personel görevlendirilmesi
Compliance Coordinator (CC) Uygunluk Yöneticisi Kalite Yönetim Sorumlusu KYS	Authorization of CAR "Corrective Action Request" forms. Review and approval of corrective and preventative actions and implementation timelines. Ensures action implementation and conducts necessary follow-up reviews. Düzeltici Faaliyet Talebi formlarının onaylanması Düzeltici ve Önleyici faaliyetlerin incelenmesi ve zamanında

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	uygulanmasının sağlanması. Alınan tedbirlerin uygulanması ve gereken takip incelemelerin yapılması.
Director/Manager Sorumlu Yönetici KYS Asistanı	Completing CAR forms when necessary. Düzeltilici Faaliyet formlarının gerektiğinde tamamlanması Implementing corrective actions and communicating changes to necessary external bodies. Düzeltilici Faaliyetlerin uygulanması ve yapılan değişikliklerle ilgili olarak harici kurumlarla iletişim.

3. DEFINITIONS

- **Nonconformity** : is a deviation from a specification, a standard, or an expectation; or the nonfulfilment of a requirement.
- **Corrective action**: actions planned and taken to correct of a nonconformity
- **Preventive action**: actions planned and taken to prevent the recurrence of a nonconformity

4. RECORDS

SP 06 F01 nonconformity and corrective action request form (NCCRF)

5. REFERANSLAR

GP 05 Appeal procedure
SP 03 Management review
SP 02 Internal Audit

6. APPLICATION

Two types of action may be initiated upon observing a nonconformity:

- Immediate action to remove the impact of nonconformity, in place, and in a simple manner.
- Planning of a remedial action to prevent the recurrence of nonconformity

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The corrective and preventive actions and results are reported to management reviews to be wholly evaluated.

Corrective Action Requests “CARs” can be directed to ETKO’s internal departments as well as to its subcontractors.

6.1. Identifying a nonconformity

Nonconformities observed in processes or activities are recorded by the observing person:

- In case there is a customer or regulatory complaint
- When an improvement opportunity is observed
- In case a nonconformity is observed during processes or work operation.
- A nonconformity identified during a regulatory or third-party audit, or internal audit;
- Nonconforming operation delivery from a subcontractor;

Nonconformities are identified and recorded using Nonconformity, Corrective & Preventive Action Request Form (SP 06 F01) (NCCPARF). Where and when the nonconformity occurred, in which process/activity, possible causes, if it is a complaint its subject matter, client ID shall duly be recorded on NCCPARF.

To prevent the recurrence of nonconformity, or to solve the client complaint appropriate corrective action is started.

6.2 Corrective Actions 8.7.4

Where necessary, QMR and/or MD takes actions to eliminate the causes of nonconformities in order to prevent recurrence

The procedures for corrective actions explains following:

- a) nonconformities are identified by the SP 06 F 01 Nonconformity, Corrective & Preventive Action Request Form (e.g. from complaints and internal audits);
- b) the causes of nonconformity are determined in this form explaining the root causes;
- c) Corrective Action plan and correcting nonconformities;
- d) Quality Management Responsible evaluates the need for actions to ensure that nonconformities do not recur;
- e) Quality Management Responsible determines and implements in a timely manner, the actions needed;

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- f) Quality Management Responsible records the results of actions taken to the SP 06 F 01; and records the CA and PA s in to the database
- g) Management reviews the effectiveness of corrective actions

A client complaint, or nonconformity shall duly be recorded on **NCCPARF** by received/observed person; then **NCCPARF** shall be submitted to QM.

QMR examines **NCCPARF** and evaluates the identified complaint/nonconformity to see if it is relevant to ETKO QMS requirements, to see the need for action, together with the relevant personnel in charge if necessary.

In case the complaint/nonconformity is related with ETKO processes, and there is a need for action, **NCCPARF** shall be signed by **QMR** and be submitted to relevant personnel to initiate the remedial action. **QMR** itself may also initiate remedial action for nonconformities or complaints. If necessary, immediate actions are taken by **QMR** for client complaints.

The personnel receiving a **NCCPARF** from **QMR** shall evaluate the identified nonconformity/complaint, investigate the root cause and determine the corrective action plan to prevent the recurrence in a timely manner; while investigating the root cause and determining the action plan, relevant personnel must be interviewed.

The corrective action plan and terminal date (date of implementation) shall be clearly recorded on **NCCPARF** by personnel in charge and **NCCPARF** is submitted back to **QMR**.

Maximum lead time to determine a corrective action plan is 5 work days.

In case of difficulty to determine corrective action plan or its implementation, **QMR** shall be communicated.

Customers shall be communicated for the consequences of their complaints verbally or in writing by **QMR**. In case the client is not satisfied and a dispute arise, GP 05 Appeal, **Complaints and Dispute** Procedure shall be implemented. The clients shall always be informed about GP 05 during contracting phase and certification process.

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6.3 Preventive Actions 8.8

Preventive actions are the actions to determine the possible nonconformities in our services and processes, removing the causes and hence, to prevent it to be occurred.

Taking preventive actions to eliminate the causes of potential nonconformities is necessary to keep the system robust and functioning properly. 8.8.1

In case such an opportunity is observed, the above mentioned shall be implemented by the observer. In case of an opportunity for preventive action preventive action box on NCCPARF shall be ticked.

Preventive actions taken must be appropriate to the probable impact of the potential problems.8.8.2

The procedures for Preventive Actions explains following:

The procedures for preventive actions define requirements for: 8.8.3

- a) potential nonconformities and their causes are identified by the QMR and recorded to SP 06 F 01 Nonconformity, Corrective & Preventive Action Request Form (e.g. from complaints and internal audits).
- b) evaluating the need for action to prevent the occurrence of nonconformities by QMR and QMR Assistant doing root cause analyses;
- c) QMR and QMR Assistant determines and implements the action needed;
- d) QMR and QMR Assistant records the results of actions taken to the SP 06 F 01; and
- e) Management reviews the effectiveness of the preventive actions taken

Implementation Steps of Preventive Actions:

1. Preventative actions are implemented when there is an increased risk for a potential nonconformity.

1.1. The need is identified on the basis of information regarding capability and performance of processes and business operations, service and customer feedback, customer complaints, and effectiveness of the quality system.

1.2. Compliance coordinator is responsible for collecting, compiling and reviewing the pertinent information, to include:

- Clients audit nonconformity reports;
- Customer complaints; and
- Quality system audit record.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

	NONCONFORMITY, CORRECTIVE & PREVENTIVE ACTIONS PROCEDURE	DOC.NR	SP 06
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1.3. Preventive actions are initiated when quality performance data indicates that there are trends of decreasing quality capability and/or effectiveness of the quality system. For example: increasing incidence of nonconformities traceable to the same common cause or increasing number of audit findings against the same standard with the client.

1.4. When a problem requiring preventive action is identified, the process of dealing with the problem follows the same steps that apply to corrective actions, as described in this procedure; Requesting and Processing CARs.

1.4.1. In subsequent processing stages both types of actions are referred to as corrective actions.

Requesting and processing CARs (applies also to preventative actions)

1.1. Corrective and preventive actions are requested using the CAR form.

1.1.1. The requests include description of the unsatisfactory condition that needs to be corrected and are addressed to the director/manager responsible for the condition

1.1.2. The same CAR form is also used to request corrective actions from ETKO's subcontractors.

1.2. Upon receiving a request for corrective action, the responsible director/manager investigates the cause of the problem that initiated the request.

6.4. Implementation and verification of corrective and preventive actions

The personnel in charge of taking action implement the actions on time and inform QMR

The action taken shall be verified for effectiveness and proper implementation by QMR, in a timely manner. The verification result is recorded on NCCPARF.

Current status of all NCCPARF forms are monitored by QMR using NCCPARF monitoring form (SP 02 F06)

Monitoring form shall be reviewed in every three month to see the effectiveness of the corrective/preventive action mechanism. In case a delay is observed in the implementation of a corrective action plan, a new target date is set, if it is appropriate.

6.5. Other Improvement Activities

The improvement activities of ETKO is not limited to a/m. data obtained during the processes are analyzed and improvement opportunities in QMS is reported to the agenda of management meetings. For the improvement activities decided by management, responsible personnel, resource requirements are determined and actions are initiated. These actions are monitored for effectiveness by management and the results are recorded on minutes of meeting.

6.5. Monitoring of customer satisfaction

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

	NONCONFORMITY, CORRECTIVE & PREVENTIVE ACTIONS PROCEDURE	DOC.NR	SP 06
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Customer satisfaction survey is made in every two years. The clients to which the survey shall be applied are selected in accordance with the criteria given below:

- The period of working with ETKO
- Size
- Product
- Sector

The survey is made by **QMR Assistant**, interviews made to clients in visits. The inspectors cannot make customer surveys.

The surveys are analyzed by **QMR and/or QMR Assistant** and reported to management, to be used as an input for improvement activities.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>		ARTEM CHERNYSH		Head Inspector <input type="checkbox"/>		Inspector <input checked="" type="checkbox"/>	
THE LICENSEE NAME & #		DOVIRA –DNIPRO - UKRAINE		No		3216F-02	
Duration of monitoring		From		19.08.2016 - 12.30 H		To	
						19.07.2016 - 19.30 H	


REQUIREMENTS Gereklikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Good			AC has good knowledge for inspection and certification procedures
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	Yes			He had required forms for inspection. Latest OCP updated NOP-IACB-COR Regulation with him and checked for different standards.
Introduction of the team Ekibin tanıtılması	Yes			He introduced the participants and roles of each participants
Confirmation of scope Kapsamın onaylanması	Yes			He confirmed NOP regulation checked if client has NOP Regulation,
Explanation of visit Ziyaret için açıklama	Yes			He explained the reason of the inspection as surveillance annual inspection for NOP
Explanation of reporting Raporlama yönteminin açıklanması	Yes			He explained OCP and reporting of issues Nonconformities identified.
Opening and Closing Meetings Açılış ve kapanış toplantıları		Yes		He performed opening meeting to explain the course of the inspection. However he did not mention which topics will be inspected throughout the inspection. Previous issues were not discussed during the opening meeting. OM could be more informative in terms of Closing meeting: He explained the results of the audit, and clearly explained possible deviations. The procedure of handling non-conformities and minor issues.
Knowledge of the product(s) Ürün bilgisi	Yes			AC has experience inspection of arable crops, he is working for ETKO since 2010 and performed many inspection with the cereal expert Dr. VG. He also graduates this year from the Agricultural Faculty department of grains.
Knowledge about the processes Proses bilgisi	Yes			AC checked through the OCP land requirement, soil maintenance, pest-disease management, inputs, biodiversity of the farm. Handling part he checked processing, labelling, inputs, training, cleaning procedures of the grains, cleaning material used for equipment and storages, pest-rodent management , traceability, harvest records, storage registers, product supplies to land owners, rental agreements, storage activities, transport, packaging
Knowledge about the handling system İşleme sistemi bilgisi	Yes			He has knowledge and experience for handling system and he does inspection sine 2010 in ETKO.
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	Yes			AC follows closely regulations, received training for IACB-COR and NOP since 2015 and 2016. Handling & Processing standards and regulations in a good level of understanding.
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet		Yes		He checked the OCP and discuss the issues with the producers OCP. Packaging material, labels, handling and storage facilities, protection of product integrity. Input-Output balance checking as verifying hectares and harvest quantities, sales and stock book, record keeping

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				<p>and document control for crops. However the input talk used for seeding machine was not correctly evaluated. BZ harvested crops was not assessed deeper with record keeping and documents. He did not measure the BZ harvested area as meters. Producer says 20 ms which is possible but was not physically measured by AC. From the field number 6m there was conventional corn on the neighbor field to the SF. He took the sample from the central part of the field not from the BZ. During sampling he wore one glove to his one hand the other hand keeping the sack. The timber used to block the gate was inside and had contact directly with the product in store was not checked if it was treated or not treated.</p>
Collection of objective evidence Nesnel kanıtların toplanması	Yes			Took pictures, copied documents, got the approval letter for the inputs, checked the harvest results and storage registers
Application package review Başvuru paketi gözden geçirme	Yes			He made a detailed APR and provided to the operators before the inspections.
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama	Yes			He prepared a detailed report and checked during both inspections.
Preparation for inspection (e.g. reading latest report, asking for forms, etc). Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	Yes			He had the latest inspection reports with him, clarified the issues described from the last inspection. All operator files checked once again before the inspections.
Presentation of nonconformities Uyumsuzlukların sunulması	Yes			He explained the areas possible for minor issues and possible NCs but he explained also that the decision will be to the file reviewer and certifier. He issued 7 NCs out of that considered as major acc. To Catalogue of Measures of etko.
Objectivity and confidentiality Taraflı ve sır saklama	Yes			He is objective, he explained confidentiality rule to the producer.
Management of difficult situations Güç durumların çözülmesi	Yes			He verified carefully the products remaining in the machinery park where they stored, evaluated the risks of contamination from the machine oil and other material. He checked carefully rotation plan and missing the leguminous in rotation.
Team participation/communication Takımla uyum ve iletişim			Yes	He performed alone this inspection
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Yes			He is polite and communication as inspector, careful for consulting etc. Inspector attitude is kept.
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	Yes			He prepared his report right after the inspections and discussed his findings with the operator.
Leadership ability Liderlik yeteneği	Yes			He lead the discussions, timing etc, did not lose the control of the inspection.
Planning and time management Planlama ve zaman yönetimi	Yes			Timing was good
clothing giyim	Yes			Good
Self confidence Kendine güven	Yes			Confident
Comments by Head Inspector/training opportunities Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri				

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- 1-However he did not mention which topics will be inspected throughout the inspection. Previous issues were not discussed during the opening meeting.
- 2-However the input talk used for seeding machine was not correctly evaluated. BZ harvested crops was not assessed deeper with record keeping and documents.
- 3-He did not measure the BZ harvested area as meters. Producer says 20 ms which is possible but was not physically measured by AC.
- 4-From the field number 6m there was conventional corn on the neighbor field to the SF. He took the sample from the central part of the field not from the BZ.
- 5-During sampling he weared one glove to his one hand the other hand keeping the sack.
- 6-The timber used to block the gate was inside and had contact directly with the product in store was not checked if it was treated or not treated.

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Mustafa Akyüz		19.08.2016
Reviewed by Office Manager	Signature	Date
Ceren Bayazıt		26.08.2016

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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NAME	(b) (6), (b) (7)(C)	Inspector <input checked="" type="checkbox"/>	Subcontractor <input type="checkbox"/>
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Qualification for: Nitelendirme alanı <input type="checkbox"/> organic production agriculture: Türkiye de organic üretim <input type="checkbox"/> organic production processing: Türkiye de organic işletme <input type="checkbox"/> organic production and processing - international: Uluslararası organic üretim ve işletme <input type="checkbox"/> other: GOTS

PART 1

Note: part 1 shall be filled by relevant personnel as the qualification proceeds

Requirements Gerekler	Training & Qualification Eğitim ve Nitelendirme	Approved Onay/tarih
Polytechnic or university degree in relevant subject (e.g. agriculture, food, forestry, textile) İlgili konularda üniversite diploması (ziraat, orman, gıda, tekstil vs)	Has graduated from the Ege University Agricultural department.	
Driver license Ehliyet	Available. B Licensee, he has not enough experiences	
Relevant training and or certificate provided by ETO or Min. of Agriculture Tarım bakanlığı ve ETO tarafından verilen kurs veya katılım sertifikaları	Has attended several courses about Organik Farming, given by Dr. Mustafa AKYÜZ, Fatih AKSOY. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs	
General knowledge of organizational structure, internal communication, etc. Organizasyonel yapı iç haberleşme, bilgisi	Has been trained by (b) (6), (b) (7), (Head Inspector) about the general organization structure, internal communication.	
General knowledge on relevant certification programs Sertifikasyon programları bilgisi	Has been trained Mustafa AKYUZ (Gen. Man.) and Fatih AKSOY (Certifier) about the general trainings about certification procedures.	
Knowledge on quality system Kalite sistemi bilgisi	Has attended to the training on Quality System Manual and relevant procedures given by Dr. Mustafa AKYÜZ (quality management responsible)	
Knowledge on administration systems Yönetim sistemi bilgisi	Has taken courses on administration system by Dr. Mustafa AKYÜZ.	
Knowledge on relevant standards Geçerli yönetmelikler standartlara ilişkin bilgi	Has attended several courses about Organik Farming, given by Min. of Agriculture. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs. he has	
Knowledge on sampling Örneklemeyle ilgili bilgi	Practical course and applied training on sampling is given by ETKO (b) (6), (b) (7) (Head Inspector) and Fatih AKSOY	
Knowledge on certification programs and procedures and forms for certification/inspection	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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Sertifikasyon programları bilgisi	has been trained by QM on certification&inspection procedures.	
Knowledge on report writing, NCR writing... Raporlama, uygunsuzluk yazma bilgisi	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Knowledge on conflict handling and interpersonal and intercultural communication Sorun çözme, iletişim yeteneği	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Spoken and written knowledge of English and preferrably German, French or Spanish İngilizce, Almanca, Fransızca veya İspanyolca okuma ve yazma yetisi olmalıdır.	Speaks and writes English at an upper intermediate level	

PART II for INSPECTOR QUALIFICATION

Inspections Kontroller	Performed (indicate units and inspection dates): Gerçekleşen (kontrol yerleri ve tarihlerini belirtiniz)			
Perform inspection under attendance, for 10 units Gözetim altında az 10 ünitenin kontrolünde bulunması	Kayseri il tarım	2562	01.06.2014	(b) (6), (b) (7)(C)
	Kayseri il tarım	2562	30.05.2014	
	Kayseri il tarım	2562	30.05.2014	
	Kayseri il tarım	2562	30.05.2014	
	Kayseri il tarım	2562	29.05.2014	
	Kayseri il tarım	2562	29.05.2014	
	Kayseri il tarım	2562	29.05.2014	
	Kayseri il tarım	2562	28.05.2014	
	Kayseri il tarım	2562	28.05.2014	
	Kayseri il tarım	2562	27.05.2014	
	Kayseri il tarım	2562	27.05.2014	
	Kayseri il tarım	2562	26.05.2014	
	Kayseri il tarım	2562	26.05.2014	
	Susitaş	2158	13.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	03.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	03.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	02.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	02.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	01.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	01.05.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014	
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014	
	APPROVAL OF HEAD INSPECTOR			

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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NAME & SIGNATURE	DATE
Fatih AKSOY	30.06.2014
OFFICE MANAGER REVIEW	
NAME & SIGNATURE	DATE
(b) (6), (b) (7)	30.06.2014

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INSPECTOR MONITORED	(b) (6), (b) (7)		Head inspector	Inspector
Subcontractor <input type="checkbox"/>			<input type="checkbox"/>	<input checked="" type="checkbox"/>
THE LICENSEE NAME & #	ÖZPA	No	2325	
Duration of monitoring	From	28.04.2016 - 09.00 H - farm 28.04.2016 - 09.00 H - Processing	To	28.04.2016 - 12.00 H - farm unit 28.04.2016 - 17.00 H - processing unit

REQUIREMENTS Gereklikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Yes			He has knowledge about ETKO procedure
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı		Yes		Checklist is ready for hardcopy and electronic files, last inspection report reviewed, he can reach regulation hardcopy and from web site, Inspector handbook is not with him and he does not know where the NOP handbook is
Introduction of the team Ekibin tanıtılması	Yes			He introduced himself and the other participant and roles of each participants
Confirmation of scope Kapsamın onaylanması	Yes			He confirmed NOP regulation and TC regulation For handling and crop production,
Explanation of visit Ziyaret için açıklama	Yes			He explained the reason of the inspection
Explanation of reporting Raporlama yönteminin açıklanması		Yes		He has not explained reporting system.
Opening and Closing Meetings Açılış ve kapanış toplantıları		Yes		He performed opening meeting; Introduction, confirmation of scope, application package review, time plan, Closing meeting: He explained the results of the audit. Reporting system has not explained
Knowledge of the product(s) Ürün bilgisi	Yes			(b) has a lot of experience production and inspection of fruits and vegetable productions and processing activities
Knowledge about the processes Proses bilgisi	Yes			He has experience about processing
Knowledge about the handling system İşleme sistemi bilgisi	Yes			He has knowledge and experience for handling system
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet		Yes		He has regulation and he can reach easily to web site, but handbook has not checked during the inspection
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	Yes			He checked the OCP Packaging material, labels, processing lines, storage facilities, and separation of organic product processing and protection of product integrity. Input-Output balance checking, record keeping and document control for raw and finished products.
Collection of objective evidence Nesnel kanıtların toplanması	Yes			He takes pictures during the inspection (also some documents photos has been taken)
Application package review Başvuru paketi gözden geçirme	Yes			He made a detailed APR and sent to the Ozpa before the inspections.
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama	Yes			He prepared a detailed report and checked during inspections.
Preparation for inspection (e.g. reading latest report, asking for forms, etc). Hazırlanma (en son raporu	Yes			He reviewed the latest inspection report.

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inceleme, formların hazırlanması vs)				
Presentation of nonconformities Uygunlukların sunulması		Yes		He explained possible for minor issues and possible NCs He has not explain reporting system
Objectivity and confidentiality Tarafsızlık ve sır saklama		Yes		He is objective He has not explain confidentially procedure of ETKO
Management of difficult situations Güç durumların çözülmesi			Yes	Not observed
Team participation/communication Takımla uyum ve iletişim			Yes	He performed alone
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Yes			He was polite during the inspection
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		Yes		He has not prepared his report after the inspections. But He discussed his findings with Ozpa
Leadership ability Liderlik yeteneği	Yes			He lead the his inspection
Planning and time management Planlama ve zaman yönetimi	Yes			Good
clothing giyim	Yes			Good
Self confidence Kendine güven	Yes			Confident

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

FA performed good inspection but following points observed;

- Reporting system has not explained
- NOP handbook has not checked
- He has not explained confidentially system of ETKO

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Fatih AKSOY		28.04.2016
Reviewed by Office Manager	Signature	Date
Mustafa AKYUZ		02.05.2016

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INSPECTOR MONITORED	FATİH AKSOY		Head inspector	Inspector
Subcontractor <input type="checkbox"/>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
THE LICENSEE NAME & #	EFAL & SUSİTAŞ	No	2325	
Duration of monitoring	From	19.07.2016 - 11.00 H 21.07.2016 - 11.00 H	To	19.07.2016 - 18.00 H 21.07.2016 - 18.00 H

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Good			FA has good knowledge for inspection and certification procedures
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	Yes			He had required forms for inspection. Latest OCP updated NOP Regulation with him and checked for different standards such as land requirement, soil maintenance, pest-disease management, biodiversity for EFAL and for Susitaş he checked processing, labelling, inputs, training, cleaning procedures, separation of organic products handling and processing, cleaning material, pest-rodent management , traceability, collection of capers and intermediary storage activities, transport, packaging
Introduction of the team Ekibin tanıtılması	Yes			He introduced the participants and roles of each participants
Confirmation of scope Kapsamın onaylanması	Yes			He confirmed NOP regulation checked if client has NOP Regulation,
Explanation of visit Ziyaret için açıklama	Yes			He explained the reason of the inspection as surveillance annual inspection for NOP
Explanation of reporting Raporlama yönteminin açıklanması	Yes			He explained OCP and reporting of Nonconformities identified.
Opening and Closing Meetings Açılış ve kapanış toplantıları	Yes			He performed opening meeting to explain the course of the inspection, evaluated briefly the issues remained from the last inspection. Closing meeting: He explained the results of the audit, and clearly explained possible deviations. The procedure of handling non-conformities and minor issues.
Knowledge of the product(s) Ürün bilgisi	Yes			FA has experience inspection of fruits and vegetable productions and processing activities
Knowledge about the processes Proses bilgisi	Yes			No handling activities present other than harvest and transport, no storage is there for EFAL but for Susitaş processing activities he has good level of knowledge for capers and other caper products.
Knowledge about the handling system İşleme sistemi bilgisi	Yes			He has knowledge and experience for handling system and he does inspection sine 2003 in ETKO.
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet		Yes		FA follows closely regulations, for manure use-composting requirement was mis-understood but clarified as reading from the regulation. Handling & Processing standards and regulations in a good level of understanding.
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	Yes			He checked the OCP and discuss the issues with the producer EFAL and OCP for Susitaş. Packaging material, labels, processing lines, storage facilities, and separation of organic product processing and protection of product integrity. Input-Output balance checking, record keeping and document control for raw and finished products.
Collection of objective evidence Nesnel kanıtların toplanması	Yes			EFAL: He checked the empty containers of the material he saw in the storage area, looked for the material, validity, approvals etc.

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				SUSİTAŞ: Took labels, Citric acid was assessed, cleaning materials storage was checked and cleaning materials authorization for food processing factories, identified the problems for record keeping practice in Susitaş, has some difficulties for tracing.
Application package review Başvuru paketi gözden geçirme	Yes			He made a detailed APR and provided to the operators before the inspections.
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama	Yes			He prepared a detailed report and checked during both inspections.
Preparation for inspection (e.g. reading latest report, asking for forms, etc). Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	Yes			He had the latest inspection reports with him, clarified the issues described from the last inspection. All operator files checked once again before the inspections.
Presentation of nonconformities Uyumsuzlukların sunulması	Yes			He explained the areas possible for minor issues and possible NCs but he explained also that the decision will be tot he file reviewer and certifier.
Objectivity and confidentiality Tarafsızlık ve sır saklama	Yes			He is objective, he explained confidentiality rule to the producer.
Management of difficult situations Güç durumların çözömlenmesi	Yes			He verified carefully the substances present in the storage areas.
Team participation/communication Takımla uyum ve iletişim	Yes			He communicated with Yusa for the substances present in the storage area in EFAL. For Susitaş he discussed with the food technologist in Susitaş fort he cleaning substances and citric acid.
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Yes			He is polite and communication as inspector, careful for consulting etc. Inspector attitude is kept.
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	Yes			He prepared his report right after the inspections and discussed his findings with the operators.
Leadership ability Liderlik yeteneđi	Yes			He lead the discussions, timing etc, did not loose the control of the inspection.
Planning and time management Planlama ve zaman yönetimi	Yes			1 hour late he started for inspection for EFAL, Susitaş was on time.
clothing giyim	Yes			Good
Self confidence Kendine güven	Yes			Confident

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değeriendirmesi /eđitim gereksinimi olan alanlar ve nedenleri

FA took sample from the almond orchard where there is a conventional field. FA said he decided to take samples because neighbor may use herbicide or pesticide.

FA performed both inspections professionally,

Head Inspector Baş kontrolör	Signature imza	Date Tarih
Mustafa Akyüz		19.07.2016
Reviewed by Office Manager	Signature	Date
Ceren Bayazıt		20.07.2016

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>		Mustafa AKYUZ		Head inspector <input checked="" type="checkbox"/>	Inspector <input type="checkbox"/>
THE OPERATOR NAME & #	Arif Gurdal Tarım Isletmesi		No	2044F-01-2016.ma	
Duration of monitoring	From	20.07.2016 11.15	To	20.07.2016 16.00	

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Evet			Sertifikasyon prosedürlerine tamamıyla hakim
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	Evet			Yönetmelik kontrol süresince yanındaydı, sorulan sorular doğrudan yönetmelik gereklilikleri hakkındaydı ve değerlendirmeye ilişkin konularda ilgili yönetmelik maddesine gerektiğinde hızlı bir şekilde ilgili bölüme ulaşılabilirdi ETKO prosedürleri elektronik olarak bilgisayarında bulunuyordu, konuya hakim. Formları kontrol öncesinde hazırlanmış
Introduction of the team Ekibin tanıtılması	Evet			Ekibin tanıtılması yapıldı, kontrol aynı zamanda eğitim şeklinde olduğundan ETKO dan katılım fazlaydı (Mustafa Akyüz, Fatih AKSOY, Yusa Yün, Uğur Şimdi, Emre Çırak)
Confirmation of scope Kapsamın onaylanması	Evet			Kapsam NOP yönetmeliğinde, kontrolün hangi alanları kapsadığı detaylı bir şekilde açımlandı
Explanation of visit Ziyaret için açıklama	Evet			Ziyaret için açıklama yapıldı
Explanation of reporting Raporlama yönteminin açıklanması	Evet			Raporlama yöntemi açıklandı, hangi raporlama ve sıralaması (OCP ve kontrol raporu) açıklandı
Opening and Closing Meetings Açılış ve kapanış toplantıları	Evet			Açılış toplantısı detaylı olarak yapıldı, yukarıda belirtilen konular toplantı sırasında belirtildi (ziyaret için açıklama, kapsam, yönetmelikler ve akreditasyon, zaman planı, ekibin tanıtımı, önceki uygunsuzlukların değerlendirilmesi, ocp değerlendirilmesi,
Knowledge of the product(s) Ürün bilgisi	Evet			Ürün bilgisi çok iyi, daha önceki yıllarda bir çok firma ile NAR konusunda organik veya

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				Globalgap standartlarında çalışılmış.
Knowledge about the processes Proses bilgisi			Evet	
Knowledge about the handling system İşleme sistemi bilgisi			Evet	
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	Evet			Yönetmelik kontrol süresince yanındaydı, Kontrol NOP a göre yapıldı, NOP konusunda çok deneyimli, sorulan sorular doğrudan yönetmelik gereklilikleri hakkındaydı ve değerlendirmeye ilişkin konularda ilgili yönetmelik maddesine gerektiğinde hızlı bir şekilde ilgili bölüme ulaşılabilirdi
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	Evet			Profesyonel ve örnek bir kontrol gerçekleştirdi.
Collection of objective evidence Nesnel kanıtların toplanması	Evet			Objektif kanıtlar her konuda incelendi, objektif kanıta ulaşılamayan konuları tespit olarak bildirdi (Şikayet prosedürü ve uygulama tanımı eksikliği, hayvan gübresi kompostlama işlemleri nasıl yapıldığı konusunda yazılı bir doküman
Application package review Başvuru paketi gözden geçirme	Evet			Başvuru paketi gözden geçirme raporu yapılmış ve kontrol öncesinde başvuru paketi değerlendirme formu ile Arif Gürdal Tarım işletmesine gönderilmiş
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama	Evet			Başvuru paketi gözden geçirme raporu yapılmış ve kontrol öncesinde başvuru paketi değerlendirme formu ile Arif Gürdal Tarım işletmesine gönderilmiş
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	Evet			En son rapor hem 2015 yılı NOP denetimi hem de 2016 yılı TR denetimi raporları incelenmiş
Presentation of nonconformities Uygunsuzlukların sunulması	Evet			Uygunsuzluklar tespit edildi ve kapanış toplantısı esnasında açıklandı, NOP denetimi olmadığı için uygunsuzluk raporu düzenlenmedi ve uygunsuzluk raporlama sistemi açıklandı

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Objectivity and confidentiality Tarafsızlık ve sır saklama	Evet			Tarafsızlık ve sır saklama konusu denetime başlarken açılış toplantısı esnasında açıklandı
Management of difficult situations Güç durumların çözülmesi	Evet			Denetim sırasında güç durumlar görülmedi, fakat müşteriye yaklaşım ve davranış konusunda oldukça profesyonel bir denetim gerçekleştirdi
Team participation/communication Takımla uyum ve iletişim	Evet			Denetim esnasında denetime katılan diğer ETKO personeli ile iletişim halinde olduğu ve onlarında denetimden istifade etmeleri sağlandı
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Evet			Müşteriye karşı kibar ve değerlendirmeler uygun
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	Evet			Kontrol zamanlaması açılış toplantısında yapıldı ve raporlama ile birlikte zaman planına uyuldu
Leadership ability Liderlik yeteneği	Evet			Denetimi kendisi yönetti ve yönlendirdi
Planning and time management Planlama ve zaman yönetimi	Evet			Kontrol zamanlaması açılış toplantısında yapıldı ve raporlama ile birlikte zaman planına uyuldu,
clothing giyim	Evet			Uygun
Self confidence Kendine güven	Evet			Çok iyi

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Örnek bir kontrol gerçekleştirildi

Head Inspector Baş kontrolör	Signature imza	Date Tarih
Fatih AKSOY		20.07.2016
Reviewed by Office Manager	Signature	Date
		

Name / Auditor / Inspector Denetmen / Kontrolör Adı		YOUNGDAE SEO		*Auditor/Denetmen <input type="checkbox"/> *Inspector/Kontrolör <input checked="" type="checkbox"/> Internal (İç) <input type="checkbox"/> External(Dış) <input checked="" type="checkbox"/>	
The Operator Name Müşahidatçı adı	YONGDONG FARM			Operator Nr Müşahidatçı No	3083F
Duration of monitoring Gözlem süresi	Date/Tarih: 2016.12.27	Başlama zamanı Time Start	13:00	Bitiş zamanı Time Finish	15:00
Scope of Monitoring Gözlem yapılan kapsam	Organic <input checked="" type="checkbox"/>	Textile <input type="checkbox"/>	Cosmetics <input type="checkbox"/>	Globalgap / İTU <input type="checkbox"/>	Other / Diğer

Requirements Gereklilikler 요구사항	Satisfactory Tatmin Edici 적합	Observation Gözlem 관찰	Not Covered İncelenmedi 부적합	Comments Görüşler 적요
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri 절차에 대한 이해	YES			서명대 심사원은 인증검사와 인증절차에 대해 잘 이해하고 있다. Inspector of SEO has good knowledge for inspection and certification procedures
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı 서류 구비(규정, 현장 매뉴얼 등)	YES			서 심사원은 인증심사서류, NOP인증기관의 최종보고서를 갖추고 있으며, 토양관리, 병해충관리, 생물다양성보전, 수확처리, 보관상태, 보관창고, 운송관리, 포장관리에 대한 내용을 검토하고, NOP규정집외에도 한국의 유기규정도 검토했다. The inspector reviewed the documents on certification and the final report of the NOP Certification Body and review the contents of soil management, pest management, biodiversity conservation, harvest processing, storage status, storage warehouse, transportation management and packing management, In addition to reviewing Korean organic regulations.
Introduction of the team Ekibin tanıtılması 팀 소개	YES			그는 참가자와 각각의 역할을 소개했다. He introduced the participants and their respective roles.
Confirmation of scope Kapsamın onaylanması 적용범위 확인	YES			그는 NOP규정에 해당하는지를 확인했다. He confirmed if client has NOP regulations.
Explanation of visit Ziyaret için açıklama 방문이유 설명	YES			그는 이번 심사는 불시방문 심사라고 그 이유를 설명했다. He explained the reason of the inspection as unannounced inspection for NOP
Explanation of reporting Raporlama yönteminin açıklanması 보고에 대한 설명	YES			그는 유기준수계획서를 설명하고 있다. He explained the Organic Compliance Plan.
Opening and Closing Meetings Açılış ve kapanış toplantıları 개시 및 종료 미팅	YES			그는 개시 미팅 시에 심사코스를 설명하고 최근에 행해진 심사를 간단하게 평가했다. 종료 미팅 시에는

				<p>심사결과와 기준위반의 가능성에 대해서 명확하게 설명했다. He explained the audit course at the opening meeting and briefly reviewed recent reviews. At the end meeting, the results of audit and the possibility of violation of standards were clearly explained.</p>
Knowledge of the product(s) Ürün bilgisi 생산제품에 대한 이해	YES			<p>서 심사원은 쌀과 엽채류 및 과채류의 심사경험이 풍부하다. 2005년 이후부터 일본유기JAS를 해오고 있다. The auditor has extensive experience in rice, leafy vegetables and fruit vegetables. Since 2005 he has been performed as Japan organic inspector.</p>
Knowledge about the processes Proses bilgisi 생산과정 이해	YES			<p>영동농장은 가공처리는 행하지 않지만, 수확후의 처리과정에 대해서는 자세하게 알고 있다. YOUNGDONG farm does not have processing, but he knows the post-harvest process about rice in detail.</p>
Knowledge about the handling system İşleme sistemi bilgisi 처리 시스템 이해	YES			<p>서 심사원은 2006년 이래 OCO(일본유기JAS인증)에서의 핸들링에 대한 지식과 경험이 있다. Since 2006, the auditor has knowledge and experience in handling in OCO of Japan Organic Certification body.</p>
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet 법규 및 규정 이해	YES			<p>서 심사원은 NOP의 규정에 대해 잘 이해하고 있다. He understands well the regulations of the NOP.</p>
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet 평가 관련 기술 이해	YES			<p>서 심사원은 유기준수계획을 검토하고 이에 대해 YDF의 생산자와 토의를 행했다. 라벨링, 저장시설, 수확후 처리과정, 유기과정, 수확투입과 생산량의 균형체크, 토양관리, 유기종자, 병해충관리, 물관리, 판매자료에 대해 검증했다. He reviewed the organic compliance plan and discussed it with the producers of the YDF. Labeling, storage facilities, post-harvest processing, organic processes, balance check of harvest input and production, soil management, organic seeds, pest management, water management, and sales information are checked and verified for organic regulations.</p>
Collection of objective evidence Nesnel kanıtların toplanması 객관적 자료 수집	YES			<p>서 심사원은 토양에 투입하는 자재를 확인하고, 수확물의 저장고의 상태와 라벨을 확인하고, 자료의 사본을 입수하고 검토했다. He checked the inputs to the soil, the condition and label of the storage of the harvested material. And took a copy of the material and reviewed it.</p>

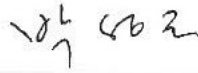
Application package review Başvuru paketi gözden geçirme 신청서일식 검토	YES			그는 신청서 패키지 검토에 대한 상세한 서류를 준비하여, 생산자에게 제공하였다. He prepared detailed APR and provided to the operators.
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama 신청서일식 검토보고서	YES			그는 상세한 보고서를 준비하고 심사 기간 중에 사항을 검토했다. He prepared a detailed report and checked during both inspections.
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs) 검사 준비(최신 보고서 읽기, 서식 요청, 등)	YES			서 심사원은 최근의 심사보고서를 갖고, 지적된 사항에 대해서 명확히 했다. 모든 운영자의 파일은 검토되고 심사전에 다시 검토되었다. He has a recent audit report and clarifies the points indicated. All operator files were reviewed and reviewed again before the audit.
Presentation of nonconformities Uygunsuzlukların sunulması 불일치시의 설명	YES			서 심사원은 지적 받은 경미 사항과 다른 경미 상황의 발생가능성 및 부적합의 가능성을 설명한다. He explained the likelihood of occurrence of minor issues and the possibility of nonconformity.
Objectivity and confidentiality Tarafsızlık ve sır saklama 객관성 및 기밀성	YES			서 심사원은 객관성 및 기밀성에 대해 설명한다. The auditor explained objectivity and confidentiality to the producer.
Management of difficult situations Güç durumların çözülmesi 문제 발생시 대처	YES			서 심사원은 저장된 수확물에 대한 위험을 검토하고 평가한다. He reviewed and evaluated the risks to the stored crops.
Team participation/communication Takımla uyum ve iletişim 구성원 참여/소통	YES			서 심사원은 혼자 심사를 수행한다. He performed alone this inspection.
Attitude and communication with operator's staff Müşterilerle iletişim ve davranış 검사원과의 태도 및 소통	YES			서 심사원은 심사원으로서 정중하게 생산자와 소통한다. 심사자로서의 태도를 유지한다. He communicate with producers respectfully as inspector. Maintain attitude as inspector.
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite) 보고(정시성 및 품질)	YES			서 심사원은 심sau 즉시 보고서를 준비하고 심사시에 발견한 내용에 대해서 토론 한다. The inspector prepared the report immediately after the audit and discuss the findings of the audit.
Leadership ability Liderlik yeteneği 지도력	YES			그는 심사시에 행하는 토론, 시간, 일정, 심사코스에 대해서 지도력 있게 리드하고 수행했다. He led and conducted leadership in the discussion, time, schedule, and inspection course at the time of

Planning and time management Planlama ve zaman yönetimi 계획 및 시간 관리	YES			inspecting. 시간대로 현장에 도착하여 계획대로 심사를 수행했다. He arrived at the site at the appointed time, and conducted the inspection as planned.
clothing giyim 복장	YES			양호하다. Good
Self confidence Kendine güven 자신감	YES			자신감 있는 자세를 갖고 있다. He has a confident attitude.

Comments by the observer /training opportunities

Gözlem yapan personelin genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri
관찰자에 의한 의견/트레이닝 기회

서 심사원은 심사를 전문성있고 적절하게 잘 수행했다.
The inspector conducted the audit professionally and appropriately.

Monitoring Made by "Observer" Gözlemi Yapan Personel İsmi 평가자	Signature İmza 서명	Date Tarih 일시
Park SungGun		2016.12.27

Reviewed by Değerlendirmeyi Yapan Personel	Signature İmza	Date Tarih
		03.01.2017

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>	(b) (6), (b) (7)(C)	Head inspector <input type="checkbox"/>	Inspector <input checked="" type="checkbox"/>
THE OPERATOR NAME & #	KALKAN MEYVE	No	2692
Duration of monitoring	From 28.06.2016 12.00	To	28.06.2016 15.30

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Evet			ETKO Sertifikasyon prosedürleri konusunda bilgi sahibi,
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	Evet			TC ve NOP yönetmeliğine kontrol sırasında ulaşabiliyordu, formlar kontrol öncesi hazırlanmış
Introduction of the team Ekibin tanıtılması	Evet			Açılış toplantısında ETKO ekibinin tanıtılması yapıldı,
Confirmation of scope Kapsamın onaylanması	Evet			Hangi kapsam ve yönetmeliklerde kontrolün gerçekleştirileceği açıklandı
Explanation of visit Ziyaret için açıklama	Evet			Takip kontrolü olacağı belirtildi
Explanation of reporting Raporlama yönteminin açıklanması	Evet			Kontrol sonrasında raporlama yapılarak sertifikere iletileceği belirtildi
Opening and Closing Meetings Açılış ve kapanış toplantıları		Evet		Açılış toplantısında yapılanlar; Ekibin tanıtılması, ETKO nun kısaca tanıtım, ziyaret için açıklama, kontrol kapsamı ve hangi yönetmeliklere göre yapılacağı, Zaman planı ve kontrol planının onaylatılması, (imzalatılması), iş planı ve kontrolün rotası çizildi), Firmanın son kontrolden bu yana olabilecek değişiklikleri sorgulandı Yapılmayanlar; • Akreditasyon konusunda bilgilendirme Kapanış toplantısı yapılanlar; Verilen uygunsuzluklar açıklandı, Ertelenen işletme kontrolü için plan yapıldı, Toplantı sonunda başında ve sonunda Teşekkür ile bitirildi, Raporlama ve belgelendirme
Knowledge of the product(s) Ürün bilgisi	Evet			Ürün bilgisi iyi

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Knowledge about the processes Proses bilgisi			Evet	Gözlemlenmedi
Knowledge about the handling system İşleme sistemi bilgisi			Evet	Gözlemlenmedi
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet		Evet		Kalkan meyve tarafından dağıtılan girdilerin Yönetmelik uygunluğu kontrol sırasında onaylanmadı
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	Evet			İyi bir kontrol gerçekleştirdi
Collection of objective evidence Nesnel kanıtların toplanması	Evet			Fotoğraflama ile görsel kanıtlar alınıyor (arazi fotoğrafları, depo fotoğrafları ve bazı kayıt örnekleri)
Application package review Başvuru paketi gözden geçirme		Evet		Başvuru paketi gözden geçirme raporu farklı bir kontrolör tarafından yapılmış, bir önceki kontrole ait kontrol raporları yanında yoktu
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama		Evet		Başvuru paketi gözden geçirme raporu farklı bir kontrolör tarafından yapılmış, bir önceki kontrole ait kontrol raporları yanında yoktu
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)		Evet		Başvuru paketi gözden geçirme raporu farklı bir kontrolör tarafından yapılmış, bir önceki kontrole ait kontrol raporları yanında yoktu Kontrol formları kontrol öncesi hazırlanmıştı
Presentation of nonconformities Uygunsuzlukların sunulması	Evet			Verilen uygunsuzluklar kapanış toplantısı sırasında sunuldu,
Objectivity and confidentiality Tarafsızlık ve sır saklama	Evet			Kontrol sırasında objektifliğini bozmadı
Management of difficult situations Güç durumların çözülmesi			Evet	Güç durum ile karşılaşılmadı
Team participation/communication Takımla uyum ve iletişim	Evet			Uygun
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Evet			Müşteriye yaklaşımı gayet uygun ve kibardı
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		Evet		Raporlama için ayrılan zaman uygun

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Leadership ability Liderlik yeteneği	Evet			Liderlik yeteneği iyi, Kontrolünü kendisi yönetiyor
Planning and time management Planlama ve zaman yönetimi	Evet			Zamanı uygun kullandı
clothing giyim	Evet			Saha kontrolü için uygun spor kıyafet
Self confidence Kendine güven	Evet			Kendine güveni iyi

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Genel olarak iyi bir kontrol gerçekleştirdi, yukarıda da belirtilen tespitlere göre kontrolörün dikkat etmesi gereken noktalar şu şekilde;

- Açılış ve kapanış toplantılarında Akreditasyon kurumu hakkında bilgi verilmeli
- Başvuru paketi değerlendirmesi kontrol öncesi yapılmalı ve kontrolör tarafından incelenmeli
- Üreticiler tarafından kullanılan girdilerin uygunluğu kontrol sırasında doğrulanmalı ve bir uygunsuz durum var ise bu konu hakkında üreticinin de bilgilendirilmesi yapılmalı

Head Inspector Baş kontrolör	Signature imza	Date Tarih
Fatih AKSOY		28.06.2016
Reviewed by Office Manager	Signature	Date
Mustafa Akyüz		14.07.2016

KONTROLÖR GÖZLEM RAPORU
INSPECTOR MONITORING REPORT

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INSPECTOR MONITORED		Head inspector		Inspector	
Subcontractor <input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
THE LICENSEE NAME & #		No		3094	
Duration of monitoring		From		To	
		16.10.2014		1 day	

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri		✓		should be improve
Documentation available (regulations, Field manual...) Yönetmelikler vb. prosedürler, formlar, kontrolör el kitabı	✓			he can reach, if he needs
Introduction of the team Ekibin tanıtılması	✓			good
Confirmation of scope Kapsamın onaylanması		✓		should be improved
Explanation of visit Ziyaret için açıklama	✓			ok
Explanation of reporting Raporlama yönteminin açıklanması		✓		not done
Opening and Closing Meetings Açılış ve kapanış toplantıları		✓		need training
Knowledge of the product(s) Ürün bilgisi	✓			good
Knowledge about the processes Proses bilgisi			✓	not covered
Knowledge about the handling system İşleme sistemi bilgisi			✓	u u
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	✓			He can reach if he need
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	✓			ok
Collection of objective evidence Nesnel kanıtların toplanması		✓		some points were different than last inspection he was not aware.
Application package review Başvuru paketi gözden geçirme		✓		"
Preparation of Application package review report Başvuru paketi gözden geçirme raporu		✓		un made

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hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			un made
Presentation of nonconformities Uygunsuzlukların sunulması	✓			he found NC and presented appropriate way
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			okay ok
Management of difficult situations Güç durumların çözülmesi	✓			good
Team participation/communication Takımla uyum ve iletişim	✓			good
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			polite person
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		✓		should be improve
Leadership ability Liderlik yeteneği	✓			
Planning and time management Planlama ve zaman yönetimi				
clothing giyim				
Self confidence Kendine güven				

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

He needs training for ETMO procedures about control and certification process.

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Ratih ARSOY	[Signature]	16.10.2014
Reviewed by Office Manager	Signature	Date
[Signature]	[Signature]	16.10.2014

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Spelka - Anten Monitoring

Head office of Spelka has been changed in this year.

Opening meeting again, he talked about the accreditation, history, Regulation, which parts of the project will be inspected, who will help during the inspection, inspection plan

Açılış toplantısı nedeniyle önce belirlenen konular değişikliği gerektirir fakat Anten Levant istemiyor.

Ruslan Levonov - Director of Spelka and Boka
Serade Mikhail Ivanovich - assistant

- Açılış toplantısı tutanağına maddeler ekliye fakat bazı konularda bahsettikleri var ve değişiyor.

- OCP alınmaması, yer gelişmeleri ve değişim

Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

eklenen çizelgeler açılış toplantısı son an

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

OP 01 F 16 Rev 01

Peth Akay

16.10.2013

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Bizim için Varlık bir dereceye kadar
fakat Varlık veya Artem derecesine göre,
oep raporların sadece bir sayısını
alabiliriz. Sadece 2012 için, 2012-13
ile faaliyetleri finanse eden 2014 de
("Dokümanlar 2013" e ait oep, stek kayıt
ve diğer me 2012 ve 2011'e ait oep
stack meeting records gibi belgeler mevcut")
- Artem dokümanları diğer okulların fotoğraflarını
alıyor.
- Kontrol notlarının konusuna ve soruları soruları
çok olan kaydediyor

Ruslar her değişiklik için için her
halinde birer gün. Dokümanları diğer
Alexey Tshibizovich Pina Sahiplerinden
kendi projeleri; herat talep ediyor fakat her
Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm
katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.
bu süreci olmuş bu nedenle burada değil.

Müşteri : Artem
Lisans no: Chernykh
OP 01 F 16 Rev 01
Merifong.
Kontrolör isim/imza: Deth AKSOY
Tarih: 16.10.2014

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Kurum 2014 baki yapulan Spel' ta da
UFC ye Sunflower feed satimini bitiren
evraklar postlenmiştir.

Spel' tan 2013 ' e ait her şey
hizmetler dosyasında yer.

Yeni adres ve yeni direktör olması dosya-
larında atanan son etimlerin son raporları

Direktör görevi 2011- Başından itibaren aynı
Zamanlarda 2015 ant-sında diğer tesislerde
eski ofislerinde her şey Alex de tutulmuş
her şey 15 yıldır aynı projeler yapılmıştır.

Müşteri yahtaları gayet iyi ve her
şeyden itibaren her zaman pürüzsüz
(Günlükte oluyordu)

Bunada her şeyin de her şeyi
her şeyi, 2 ay boyunca her şey.

Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm
katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Yeni ofis ve direktör değişimi, nedensiz her şey

her şeyin dosyaları (Apprater form, ocr, Repetition dosyası, her şey)

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

7; - 15-16

$$\hat{\gamma} = 100\%$$

OP 01 F 16 Rev 01

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Spelta
Karhavelhoe - farm

- Openy Meeting
- Etiketleme planı yapıldı ✓
 - Etiketleme planı yapıldı ✓
 - Test için laboratuvarlar ile ilgili görüşmeler
 - İş planı yapıldı
 - Kontrol planı geliştirildi
 - Uygulama için talimatlar
 - organe Standards according to EU
 - İnce plan ✓
 - İnce plan ile ilgili çalışmalar

KS-2 notu ari ile elin verildi
Sonda burada pakette sınırlı yüksek
değerde

Tekrar deneyimi sonda, dolayısıyla genel
istekler

NH₃ NO₃ 100 g / pe he

2 Bu çiftlikte aynı zamanda 100 gr
parçalar var

Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

OP 01 F 16 Rev 01

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Tamamını propeze hafızaları ile aynı ve
maddede 2a parantezinde de aynı şekilde yazılan
peşinde her iki maddede de aynı, bu şekilde
mükerrer alınmalı

Spelto bu şekilde
ilgili olmaktadır. Bu alana
depodaki maddeler ayrıştıkça!
Depoda bulunan ve ayrıştıkça
Söylenen maddeler paralel maddelerle
mükerrer.

2 ay önce mükerrer depozito bu maddede
gittikçe belgeleri ve spelto ile anlaşılacakla belgeler
etisik isimler farklı sistem kontrol etti.

Note

Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Spelita - Anteni Anteniden

Genel bu sistemin satış sonrası servisi.
Bu yıl farklı beklentiler.
Anten için lingual kullanılmaması.
Tepkisi 6762 ha olanlar
6000 ha olan için detayların alınması
gibi ama olarak 6762 ha için alını
(Gizli) kapsızlar yeni okul, binalar, depolar
işletme tarımı anarisi ise 6000 ha detaylı.
Tahmin ng formu alınması işi
hatırlatıldı

Kontrol sırasında Anteni satış sonrası servisi.
Depodaki cihazlar pek matemedir!
Anteni'e hatırlatıldı ve inceltir.

~~Şu an kadar stekleri işletmelerden pek
almadığını belirttik~~, imzalı olarak
denetim boyunca alınması gerektiği ve balance
check yapması gerektiği belirtilmiştir.

Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm
katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

OP 01 F 16 Rev 01

3097 -

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Devlet kurum. kullandıkları tahmini
denetleyici ve münavele ediyormuş. sonucunda
satışta veriyor.

2013 crop sold January 2014
WFC - 5000 tons transaction

produced
amount

sold
am.

stocked
am.

Explanation
to Speltz
or to both

Note

Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

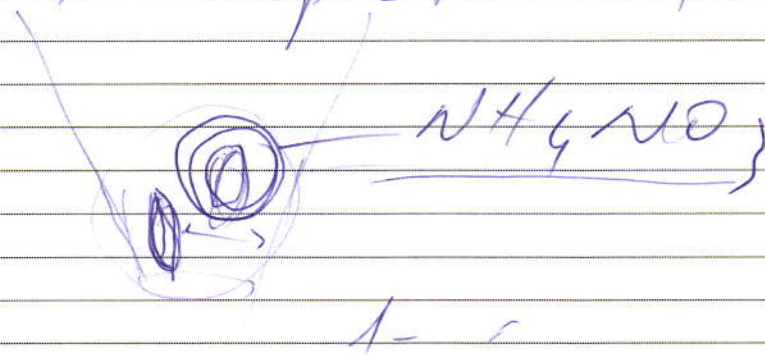
Lisans no:

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

Antem observations

- OCP reports
- Opening meeting missing points
- Parallel production
- Split operation
- Balance check on stored and bought and sold products
- Balance check about using inputs
- MC for using NH_4NO_3 in American nitrate

→ Inspection training for Antem



Note

Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

Yönetmelik maddesi (Regulation clause)	
Görüşülen kişi (Person interviewed)	

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. On the right side, there are two circular punch holes, one near the top and one near the bottom, indicating it was part of a binder. The paper appears slightly aged or off-white. There is no handwriting or printed text on the page.

Note	Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.
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Müşteri :	Kontrolör isim/imza:	Tarih
Lisans no:		

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
		TARİH	01.05.2014
		REV. NO	00
		SAYFA	1 / 3

NAME	(b) (6), (b) (7)(C)	Inspector <input checked="" type="checkbox"/>	Subcontractor <input type="checkbox"/>
------	---------------------	--	---

Qualification for: Nitelendirme alanı <input type="checkbox"/> organic production agriculture: Türkiye de organic üretim <input type="checkbox"/> organic production processing: Türkiye de organic işletme <input type="checkbox"/> organic production and processing - international: Uluslararası organic üretim ve işletme <input type="checkbox"/> other: GOTS

PART 1

Note: part 1 shall be filled by relevant personnel as the qualification proceeds

Requirements Gerekler	Training & Qualification Eğitim ve Nitelendirme	Approved Onay/tarih
Polytechnic or university degree in relevant subject (e.g. agriculture, food, forestry, textile) İlgili konularda üniversite diploması (ziraat, orman, gıda, tekstil vs)	Has graduated from the Ege University Agricultural department.	
Driver license Ehliyet	Available. B Licensee, he has not enough experiences	
Relevant training and or certificate provided by ETO or Min. of Agriculture Tarım bakanlığı ve ETO tarafından verilen kurs veya katılım sertifikaları	Has attended several courses about Organik Farming, given by Dr. Mustafa AKYÜZ, Fatih AKSOY. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs	
General knowledge of organizational structure, internal communication, etc. Organizasyonel yapı iç haberleşme, bilgisi	Has been trained by (b) (6), (b) (7), (Head Inspector) about the general organization structure, internal communication.	
General knowledge on relevant certification programs Sertifikasyon programları bilgisi	Has been trained Mustafa AKYUZ (Gen. Man.) and Fatih AKSOY (Certifier) about the general trainings about certification procedures.	
Knowledge on quality system Kalite sistemi bilgisi	Has attended to the training on Quality System Manual and relevant procedures given by Dr. Mustafa AKYÜZ (quality management responsible)	
Knowledge on administration systems Yönetim sistemi bilgisi	Has taken courses on administration system by Dr. Mustafa AKYÜZ.	
Knowledge on relevant standards Geçerli yönetmelikler standartlara ilişkin bilgi	Has attended several courses about Organik Farming, given by Min. of Agriculture. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs. he has	
Knowledge on sampling Örneklemeyle ilgili bilgi	Practical course and applied training on sampling is given by ETKO (b) (6), (b) (7) (Head Inspector) and Fatih AKSOY	
Knowledge on certification programs and procedures and forms for certification/inspection	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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Sertifikasyon programları bilgisi	has been trained by QM on certification&inspection procedures.	
Knowledge on report writing, NCR writing... Raporlama, uygunsuzluk yazma bilgisi	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Knowledge on conflict handling and interpersonal and intercultural communication Sorun çözme, iletişim yeteneği	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Spoken and written knowledge of English and preferrably German, French or Spanish İngilizce, Almanca, Fransızca veya İspanyolca okuma ve yazma yetisi olmalıdır.	Speaks and writes English at an upper intermediate level	

PART II for INSPECTOR QUALIFICATION

Inspections Kontroller	Performed (indicate units and inspection dates): Gerçekleşen (kontrol yerleri ve tarihlerini belirtiniz)		
Perform inspection under attendance, for 10 units Gözetim altında az 10 ünitenin kontrolünde bulunması	Kayseri il tarım	2562	01.06.2014
	Kayseri il tarım	2562	30.05.2014
	Kayseri il tarım	2562	30.05.2014
	Kayseri il tarım	2562	30.05.2014
	Kayseri il tarım	2562	29.05.2014
	Kayseri il tarım	2562	29.05.2014
	Kayseri il tarım	2562	29.05.2014
	Kayseri il tarım	2562	28.05.2014
	Kayseri il tarım	2562	28.05.2014
	Kayseri il tarım	2562	27.05.2014
	Kayseri il tarım	2562	27.05.2014
	Kayseri il tarım	2562	26.05.2014
	Kayseri il tarım	2562	26.05.2014
	Susitaş	2158	13.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	03.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	03.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	02.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	02.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	01.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	01.05.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014
	Arisu Gıda Dış Ticaret A.Ş	2009	30.04.2014
APPROVAL OF HEAD INSPECTOR			

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
		TARİH	01.05.2014
		REV. NO	00
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NAME & SIGNATURE	DATE
Fatih AKSOY	30.06.2014
OFFICE MANAGER REVIEW	
NAME & SIGNATURE	DATE
(b) (6), (b) (7)	30.06.2014

 KONTROLÖR GÖZLEM RAPORU INSPECTOR MONITORING REPORT	BELGE NO	SP 05 F 01
	TARİH	01.05.2014
	REV. NO	00
	SAYFA	1 / 2

INSPECTOR MONITORED	(b) (6), (b) (7)(C)		Head inspector	Inspector
Subcontractor <input type="checkbox"/>			<input type="checkbox"/>	<input checked="" type="checkbox"/>
THE LICENSEE NAME & #	Spil Natural Hırtı		No	2560
Duration of monitoring	From	28.09.2014	To	28.09.2014

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri		✓		Belirlenmeli
Documentation available (regulations, Field manual...) Yönetmelikler vb. prosedürler, formlar, kontrolör el kitabı		✓		Formlar ve yönetmelikler form holder içinde Yanında yönetmelik olarak
Introduction of the team Ekibin tanıtılması		✓		Yetersiz Detaylı anlatım
Confirmation of scope Kapsamın onaylanması	✓			Yapıldı
Explanation of visit Ziyaret için açıklama	✓			Uygun
Explanation of reporting Raporlama yönteminin açıklanması		✓		Belirlenmeli
Opening and Closing Meetings Açılış ve kapanış toplantıları		✓		Açılış yapıldı Kapanış yapıldı
Knowledge of the product(s) Ürün bilgisi	✓			Uygun
Knowledge about the processes Proses bilgisi			✓	Prosesler anlatıldı
Knowledge about the handling system İşleme sistemi bilgisi			✓	Sadece anlatıldı
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet		✓		Yönetmelikler anlatıldı
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet		✓		Belirlenmeli
Collection of objective evidence Nesnel kanıtların toplanması	✓			Namussu alındı
Application package review Başvuru paketi gözden geçirme		✓		Özellikler gözden geçirildi
Preparation of Application package review report Başvuru paketi gözden geçirme raporu		✓		

KONTROLÖR GÖZLEM RAPORU
INSPECTOR MONITORING REPORT

BELGE NO	SP 05 F 01
TARİH	01.05.2014
REV. NO	00
SAYFA	2 / 2

hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			Uygun
Presentation of nonconformities Uyumsuzlukların sunulması		✓		Yeterli derecede anlatılmış
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			Uygun
Management of difficult situations Güç durumların çözülmesi			✓	
Team participation/communication Takımla uyum ve iletişim	✓			Beğenili
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			Beğenili
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		✓		Zaman iyi kullanıldı
Leadership ability Liderlik yeteneği	✓			Beğenili
Planning and time management Planlama ve zaman yönetimi		✓		Zaman iyi kullanıldı
clothing giyim	✓			Yeterli
Self confidence Kendine güven	✓			Tam

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Head Inspector Baş Kontrolör	Signature (b) (6), (b) (7)(C)	Date Tarih
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	28.09.2014
Reviewed by Office Manager		Date
Fatih Arsoy	(b) (6), (b) (7)(C)	06.10.2014

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>	(b) (6), (b) (7)(C)	Head inspector <input type="checkbox"/> Inspector <input checked="" type="checkbox"/>
THE LICENSEE NAME & #	ARİF GÜRDAL	No
Duration of monitoring	From	To
	13.00	2044
		18.00

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	Yes			(b) (6), is expert in livestock
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	Yes			Electronical versions are present
Introduction of the team Ekibin tanıtılması	Yes			He introduced the participants
Confirmation of scope Kapsamın onaylanması	Yes			He explained the purpose of the visit and the scope
Explanation of visit Ziyaret için açıklama	Yes			He explained the follow up visit for the purpose of verification of the NCs issued during the previous audit.
Explanation of reporting Raporlama yönteminin açıklanması	Yes			He explained the details of the corrective actions and reporting. No NCs were described during this audit.
Opening and Closing Meetings Açılış ve kapanış toplantıları	Yes			He explained the results of the audit. Technical stuff Arif Gürdal, Süleyman Küçük, Ömer Kurt were present during the opening and closing meeting.
Knowledge of the product(s) Ürün bilgisi	Yes			(b) knows very well milk production
Knowledge about the processes Proses bilgisi			Yes	There is no process in the farm. Only raw milk is provided and loaded through Tire Süt company containers.
Knowledge about the handling system İşleme sistemi bilgisi	Yes			He checked the handling of the milk, feeding material
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	Yes			(b) has TC Regulation and IACB standard with him. National regulation for livestock farm. Livestock farming, production, inspection, regulation Nr

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				26254.
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	Yes			(b) has knowledge about the techniques for livestock farms, milking, feed handling, silage process etc.
Collection of objective evidence Nesnel kanıtların toplanması	Yes			He makes photos, take notes, speaks with the workers, checks the cows and silage, take samples.
Application package review Başvuru paketi gözden geçirme	Yes			Done before inspection
Preparation of Application package review report Başvuru paketi gözden geçirme raporu hazırlama	Yes			Done before inspection
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	Yes			He had the old file with him and checked the latest report, sampling forms, NC reports and resolutions files.
Presentation of nonconformities Uyumsuzlukların sunulması			Yes	He did not describe and NC
Objectivity and confidentiality Tarafsızlık ve sır saklama	Yes			He is objective
Management of difficult situations Güç durumların çözülmesi	Yes			He knows what to do during the audit and reporting.
Team participation/communication Takımla uyum ve iletişim	Yes			He communicate with his colleagues incase any help he needs.
Attitude and communication with licensees Müşterilerle iletişim ve davranış	Yes			He is neutral, not very friendly and not very official.
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	Yes			He finished his report at the end of the audit.
Leadership ability Liderlik yeteneği	Yes			He controls the timing and the conversations
Planning and time management Planlama ve zaman yönetimi	Yes			Time management is good.
clothing giyim	Yes			Clothing is good for auditing in the farm.
Self confidence Kendine güven	Yes			He is confident.

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Opening meeting was done, program and purpose of the inspection was explained, non-conformities

raised during the previous audits were explained and corrective actions were discussed. He explained which areas of the production will be assessed today.

Previous NCs and implementation, Site plan, Feeding, Veterinary treatments, General production practices

Previous Non Conformities Raised during IOAS audit:

NCs 1: Bedding: It was observed that straw was used as bedding

NCs 2: All male livestock was sold, no more kept in the farm.

NCs 3: Use of veterinary medicines were assessed and found out that implementation is correctly done, veterinary medicines were approved by ETKO before use. Additionally a procedure was prepared Livestock Health and Veterinary Treatment Procedure.

NCs 4: Veterinary medicines treatments were recorded regularly and a list kept.

NCs 5: Sheds are clean, cleaning is done 3 times a day. Animals are certified as parasite free.

NCs 6: Withdrawal periods are registered in the medical treatment list regularly

NCs 7: The room was isolated by nets and entrance for birds, rats, insects were prevented.

NCs issued by Devrim during IOAS audit:

NC 1-Open excess areas were not possible for the heifers:

The access door was fixed and cows can easily exit from the gate to the open access area. The open area is renewed as bringing in more soil to the area and a good leveling is provided in order to livestock easily move and rest.

NC 2-Sick livestock was kept with the herd.

Sick animal was excluded immediately after the inspection already. Farm technical stuff is aware of separation of the sick animal. The procedure Animal Health and Veterinary Treatment procedure prepared and the exclusion of sick animal was explained in details in the procedure. (Point b)

NC 3-There was no clear indications for different sections and products stored in the farm as well as no instructions were present cleaning, veterinary treatments, milking, workers safety etc.

Instructions were prepared and demonstrated in related sections of the farms, such as each type of feed material was clearly indicated with a plate such as Organic alfa alfa 2014 crop. 2013 crop soy straw etc.

Feeding area, milking area, open air area cleaning instructions. Pest and rodent control instruction etc. Milking process flow chart, bedding cleaning and feeding line flow chart. Milking unit cleaning flow chart, manure treatment and handling flow chart present.

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Mustafa Akyüz		06.11.2014
Reviewed by Office Manager	Signature	Date
(b) (6), (b) (7)(C)		07.11.2014

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INSPECTOR MONITORED			Head inspector	Inspector
Subcontractor <input type="checkbox"/>	(b) (6), (b) (7)(C)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
THE LICENSEE NAME & #	Dennex		No	3114
Duration of monitoring	From	11.00 29.12.2014	To	17.00 29.12.2014

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	✓			Dahil iys
Documentation available (regulations, Field manual...) Yönetmelikler vb. prosedürler, formlar, kontrolör el kitabı	✓			Yönetmelikler, formlar, el kitabı mevcut ve erişilebilir
Introduction of the team Ekibin tanıtılması	✓			uygun
Confirmation of scope Kapsamın onaylanması	✓			acıklanıyor yapıldı
Explanation of visit Ziyaret için açıklama	✓			yağıldı
Explanation of reporting Raporlama yönteminin açıklanması	✓			Kapalı, kapalı olarak olacağı belirtilen yapıldı
Opening and Closing Meetings Açılış ve kapanış toplantıları	✓			yağıldı
Knowledge of the product(s) Ürün bilgisi	✓			iys
Knowledge about the processes Proses bilgisi		✓		geliştirilmeli
Knowledge about the handling system İşleme sistemi bilgisi		✓		geliştirilmeli
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	✓			iys
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	✓			iys
Collection of objective evidence Nesnel kanıtların toplanması	✓			değiştirilmeli (fotoğraf)
Application package review Başvuru paketi gözden geçirme	✓			yağıldı
Preparation of Application package review report Başvuru paketi gözden geçirme raporu	✓			yağıldı

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

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hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			iyi
Presentation of nonconformities Uyumsuzlukların sunulması	✓			Kapama raporları içinde uyumdu
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			iyi
Management of difficult situations Güç durumların çözülmesi	✓			Göç için problemler vardı, iyi oldu
Team participation/communication Takımla uyum ve iletişim	✓			iyi
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			iyi
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	✓			Raporlama iyi zaman doğru bir miktarda idi
Leadership ability Liderlik yeteneği	✓			iyi
Planning and time management Planlama ve zaman yönetimi	✓			zaman or miktarda doğru sıklıkla sınırlıydı
clothing giyim		✓		işletme denetimlerinde gösterildi
Self confidence Kendine güven	✓			iyi

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi / eğitim gereksinimi olan alanlar ve nedenleri

- İşleme sisteminin bilgisi ve proses bilgisi geliştirilmeli
- İşletme denetimlerinde işleme dikkat edilmesi

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Patlı AKSOY	[Signature]	29.12.2014
Reviewed by Office Manager	Signature	Date
(b) (6), (b) (7)(C)		29.12.2014

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>		Head inspector <input checked="" type="checkbox"/> Inspector <input type="checkbox"/>	
THE LICENSEE NAME & #		No	
Dr. Mustafa Akyüz Finhan Tarım An. Ltd. St.		GGN 405285262 0567	
Duration of monitoring	From	To	
	22.10.2014		1 day / 1 gün

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	✓			Çok iyi
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	✓			Habermizet çok iyi
Introduction of the team Ekibin tanıtılması	✓			yapıldı
Confirmation of scope Kapsamın onaylanması	✓			Çok iyi
Explanation of visit Ziyaret için açıklama	✓			Açılış toplantısı çok iyidir
Explanation of reporting Raporlama yönteminin açıklanması	✓			yapıldı
Opening and Closing Meetings Açılış ve kapanış toplantıları	✓			Muhammed performans
Knowledge of the product(s) Ürün bilgisi	✓			Geherdehiz içinde dolukta
Knowledge about the processes Proses bilgisi	✓			Çok iyi
Knowledge about the handling system İşleme sistemi bilgisi	✓			deneyimsel ve bilgisi yüksel
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	✓			Muhammed
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	✓			Uyg. ve derecelendire çok iyi
Collection of objective evidence Nesnel kanıtların toplanması	✓			Çok iyi
Application package review Başvuru paketi gözden geçirme	✓			Değerlendirmiş ve elirbe bulgularından yapıldı
Preparation of Application package review report Başvuru paketi gözden geçirme raporu	✓			yapıldı

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hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			şah. işi sonrak oldu
Presentation of nonconformities Uyumsuzlukların sunulması	✓			profesyonelce yapıldı
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			açıklamalar iyiydi:
Management of difficult situations Güç durumların çözülmesi	✓			seron oluşturmada şah. süreci doğru yolda, uyg- iyi sonuçta
Team participation/communication Takım uyumu ve iletişim	✓			Ekip çalışması ş. işi
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			örnek kabul edilebilir
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)	✓			zaman planına tam uydu
Leadership ability Liderlik yeteneği	✓			duruşu ve hant. yönetimi
Planning and time management Planlama ve zaman yönetimi	✓			alışmanın performans
clothing giyim	✓			uygun
Self confidence Kendine güven	✓			ş. işi
Comments by Head Inspector/training opportunities Gözlem yapan kontrolörün genel değerlendirmesi / eğitim gereksinimi olan alanlar ve nedenleri				
Gelişim performans, zaman yönetimi mükemmeldi açık - kapanış - ara tam planlı işi saatlerce yapıldı				
Head Inspector Baş kontrolör	Signature imza		Date Tarih	
Patih AKSOY	[Signature]		22.10.2014	
Reviewed by Office Manager	Signature		Date	
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)		22.10.2014	

 GLOBALG.A.P.	Kontrol Detay Planı İTU & GLOBALGAP	BELGE NO	OP 05 F 04
		TARİH	20.07.2014
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License Name Müşerbbis adı	FİNKUM TARIM ÜRÜNLERİ İHR.TAŞ.LTD.ŞTİ	Date prepared Hazırlama tarihi	17.10.2014
License No Müşerbbis no	GGN 4052852620567	Date inspection Kontrol tarihi	22.10.2014
Inspector name Kontrolör Adı	Mustafa AKYÜZ	Signature inspector Kontrolör İmza	
Inspector Assignments Authorized Kontrolör Atama Yetkilisi	Uğurcan KARAÇELİK	Signature Assignments Authorized Yetkili İmza	
License Responsible Müşerbbis Yetkilisi	Hakan ARIKAN	Signature Responsible Yetkili İmza	
<input checked="" type="checkbox"/>	Atanan Kontrolörü kabul eder kendisiyle son 24 ay içerisinde ticari bir ilişkimiz olmadığını beyan ederiz. We accept the inspector assigned and declare that we did not have any commercial relationship with him/her since last 24 month		
<input checked="" type="checkbox"/>	Atanan Kontrolörle herhangi bir aile bağı ve tarafsızlığı ihlal edecek bir ilişkimiz bulunmamaktadır. We do not have any family or any other relationship with the assigned inspector to violate confidentiality and neutrality rules.		
<input type="checkbox"/> First Insp. İlk Kontrol	<input checked="" type="checkbox"/> Surveillance Insp. Takip Kontrol	<input type="checkbox"/> Unannounced Insp. Habersiz Kontrol	

Scope: Kapsam		<input type="checkbox"/> İyi Tarım Uygulamalarına İlişkin Yönetmelik 27778/2010	<input checked="" type="checkbox"/> GLOBALGAP V4.0 -2 (Mart 2013)
Kontrol Tarihi	*Zaman (Süre)	<input type="checkbox"/> Bireysel Üretici / <input type="checkbox"/> Üretici Grubu Üyesi (Üye 1, 2,3)	<input checked="" type="checkbox"/> Kontrol Edilecek Alan (Arazi, Depo, Kalite El Kitabı, Prosedürler, vb)
22.10.2014	09:30-10:00	Açılış Toplantısı	
	10:00-13:00	QMS Uygunluklarının takibi	Finkum KYS ve İşletme kontrolü (kayıtlar, İşletme, depo, alım-satım belgeleri)
	13:00-14:00	Yemek Arası	
	14:00-17:00	Üretici Denetimi, uygunluklarının takibi	Arazi, depo, alet-ekipman, kayıtlar
	17:00-18:00	Raporlama ve kapanış toplantısı	

NOTE: Görevlendirilen kontrolör denetimden en az 2 gün önce gerekli olan evrakları ETKO'dan almalıdır. Kontrol listeleri, uygunluk raporları, bir önceki denetim sonuçları (geçerliyse), ve geçerli olan yönetmelik / standardın nihai versiyonu.

Inspector assigned for this particular audit must receive documents required from ETKO at least 2 days before the audit day. Minimum documents are the checklists, Non conformity forms, previous audit documents (if applicable) and current version of the standard / regulation.

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

 GLOBALG.A.P.	Kontrol Detay Planı İTU & GLOBALGAP	BELGE NO	OP 05 F 04
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Production - Üretim		Denetleme / Inspection		
No	Konu	EVET	HAYIR	G/D
1	Meeting producer - Üreticiyle görüşme			
2	İTU & GG Yönetmeliği mevcut			
3	İTU & GG 20 Kontrol Kriterleri mevcut			
4	Uygunsuzluklar kapatılmış			
5	Tapu ve harita belgeleri mevcut			
6	İzlenebilirlik mevcut			
7	Kalite sistemi mevcut			
8	İç Denetim yapılmış			
9	Kullanılan üretim materyali bilgisi mevcut			
10	Substrat ile ilgili bilgiler mevcut			
11	Kullanılan gübreler ile ilgili bilgiler mevcut			
12	Sulama ile ilgili bilgiler mevcut			
13	Kullanılan ilaçlar ile ilgili bilgiler mevcut			
14	Kalite sistemi gereği temizlik, zararlı kontrol prosedürleri ve belgeleri mevcut			
15	Çevre temizliği ve flora-faunanın geliştirilmesine ilişkin plan mevcut			
16	Çalışanların sosyal statülerini gösterir belgeler, kanıtlar mevcut			
17	Analiz ile ilgili sonuçlar mevcut			
18	Son alıcı ile ilgili bilgiler mevcut			

İşletme - Process		Denetleme Inspection		
No	Konu	EVET	HAYIR	G/D
1	Meeting producer - Üreticiyle görüşme			
2	İTU & GG Yönetmeliği mevcut			
3	İTU & GG Kontrol Kriterleri mevcut			
4	Uygunsuzluklar kapatılmış			
5	İşletme yerleşim planı ve akış şeması mevcut			
6	İzlenebilirlik mevcut			
7	Kalite sistemi mevcut			
8	İç Denetim yapılmış			
9	Kullanılan üretim materyali-spesifikasyonu bilgisi mevcut			
10	Kalite sistemi gereği temizlik, zararlı kontrol prosedürleri ve belgeleri mevcut			
11	Çevre temizliği ve flora-faunanın geliştirilmesine ilişkin plan mevcut			
12	Çalışanların sosyal statülerini gösterir belgeler, kanıtlar mevcut			
13	Analiz ile ilgili sonuçlar mevcut			
14	Son alıcı ile ilgili bilgiler mevcut			

NOTE: Görevlendirilen kontrolör denetimden en az 2 gün önce gerekli olan evrakları ETKO'dan almalıdır. Kontrol listeleri, uygunsuzluk raporları, bir önceki denetim sonuçları (geçerliyse), ve geçerli olan yönetmelik / standardın nihai versiyonu.

Inspector assigned for this particular audit must receive documents required from ETKO at least 2 days before the audit day. Minimum documents are the checklists, Non conformity forms, previous audit documents (if applicable) and current version of the standard / regulation.

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

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INSPECTOR MONITORED Subcontractor <input type="checkbox"/>		(b) (6), (b) (7)(C)		Head inspector <input checked="" type="checkbox"/>	Inspector <input type="checkbox"/>
THE LICENSEE NAME & #		Süeritay		No	2158
Duration of monitoring		From	25.03.14	To	1 gün

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri	✓			iyi
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı	✓			iyi
Introduction of the team Ekibin tanıtılması	✓			yapıldı
Confirmation of scope Kapsamın onaylanması	✓			yapıldı
Explanation of visit Ziyaret için açıklama	✓			kısa ama uygun
Explanation of reporting Raporlama yönteminin açıklanması	✓			yapıldı
Opening and Closing Meetings Açılış ve kapanış toplantıları		✓		Kısa ve net, yönetmelik, alacaklar, zaman planı, el kitabı
Knowledge of the product(s) Ürün bilgisi		✓		Ürün görsel olarak
Knowledge about the processes Proses bilgisi	✓			iyi
Knowledge about the handling system İşleme sistemi bilgisi	✓			iyi
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet	✓			Yönetmelik ve ulusal standartlar (TC-EU-NOP)
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	✓			iyi
Collection of objective evidence Nesnel kanıtların toplanması	✓			iyi
Application package review Başvuru paketi gözden geçirme	✓			İfist tarafından yapıldı (ETKO)
Preparation of Application package review report Başvuru paketi gözden geçirme raporu	✓			"

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hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			inelenmiş
Presentation of nonconformities Uygunsuzlukların sunulması			✓	ilkeri deaktif belirlendi
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			iyi
Management of difficult situations Güç durumların çözülmesi			✓	çok büyük sorunlar olmadı
Team participation/communication Takımla uyum ve iletişim	✓			iyi
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			bayet kıvar
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		✓		Zaman planına uyulmadı
Leadership ability Liderlik yeteneği	✓			iyi
Planning and time management Planlama ve zaman yönetimi		✓		Zaman planına uyulmadı
clothing giyim	✓			uygun
Self confidence Kendine güven	✓			iyi

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Açık toplantısı çok kısa tutuldu, Zaman planı müşteriye bırakıldı fakat planıda uyulmadı

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Fatih AKSOY	[Signature]	25.03.2014
Reviewed by Office Manager	Signature	Date

Yönetmelik maddesi
(Regulation clause)
Görüşülen kişi
(Person interviewed)

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

Ahmet (Mentor)

Açılış Toplantısı

Yönetmelikler ile ilgili bahsedildi, konular
belirlendi, açılış toplantı tutanağını, maddeler
2. maddesi plan 14.30 - 17.30 arası düzenli
planlandı.

Yeni kapsam açılış ve istenilen
konulara ilişkin edeceği değerlendirildi.

- Sorulara, gündereceği
- Fikide sağlık için örnek eylem
konuları olacak.

Kapanış toplantıları kısa ve net
Ayrıca zaman planı müşteriye sunulacaktır.

Note Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.

Müşteri :

Kontrolör isim/imza:

Tarih

Lisans no:

Yönetmelik maddesi (Regulation clause)	
Görüşülen kişi (Person interviewed)	

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. On the right side, there are two circular punch holes, one near the top and one near the bottom, indicating it was part of a binder. The paper appears slightly aged or off-white. There is no handwriting or printed text on the page.

Note	Kontrolör tarafından Açılış ve Kapanış toplantıları konuları bu form üzerinde belirtilip tüm katılımcıların ad-soyad ve imzalarının alınması sağlanacaktır.
-------------	--

Müşteri :	Kontrolör isim/imza:	Tarih
Lisans no:		

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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NAME	(b) (6), (b) (7)	Inspector <input checked="" type="checkbox"/>	Subcontractor <input type="checkbox"/>
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Qualification for: Nitelendirme alanı <input type="checkbox"/> organic production agriculture: Türkiye de organic üretim <input type="checkbox"/> organic production processing: Türkiye de organic işletme <input type="checkbox"/> organic production and processing - international: Uluslararası organic üretim ve işletme <input type="checkbox"/> other:
--

PART 1

Note: part 1 shall be filled by relevant personnel as the qualification proceeds

Requirements Gerekler	Training & Qualification Eğitim ve Nitelendirme	Approved Onay/tarih
Polytechnic or university degree in relevant subject (e.g. agriculture, food, forestry, textile) İlgili konularda üniversite diploması (ziraat, orman, gıda, tekstil vs)	Has graduated from the Mustafa Kemal University Agricultural department.	
Driver license Ehliyet	Available. B Licensee,	
Relevant training and or certificate provided by ETO or Min. of Agriculture Tarım bakanlığı ve ETO tarafından verilen kurs veya katılım sertifikaları	Has attended several courses about Organik Farming, given by Dr. Mustafa AKYÜZ, Fatih AKSOY. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs	
General knowledge of organizational structure, internal communication, etc. Organizasyonel yapı iç haberleşme, bilgisi	Has been trained by (b) (6), (b) (7), (Head Inspector) about the general organization structure, internal communication.	
General knowledge on relevant certification programs Sertifikasyon programları bilgisi	Has been trained Mustafa AKYUZ (Gen. Man.) and Fatih AKSOY (Certifier) about the general trainings about certification procedures.	
Knowledge on quality system Kalite sistemi bilgisi	Has attended to the training on Quality System Manual and relevant procedures given by Dr. Mustafa AKYÜZ (quality management responsible)	
Knowledge on administration systems Yönetim sistemi bilgisi	Has taken courses on administration system by Dr. Mustafa AKYÜZ.	
Knowledge on relevant standards Geçerli yönetmelikler standartlara ilişkin bilgi	Has attended several courses about Organik Farming, given by Min. of Agriculture. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs. he has	
Knowledge on sampling Örneklemeyle ilgili bilgi	Practical course and applied training on sampling is given by ETKO (b) (6), (b) (7) (Head Inspector) and Fatih AKSOY	
Knowledge on certification programs and procedures and forms for certification/inspection	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), and (b) (6), (b) (7) has been trained by	

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
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		REV. NO	00
		SAYFA	2 / 3

Sertifikasyon programları bilgisi	QM on certification&inspection procedures.	
Knowledge on report writing, NCR writing... Raporlama, uygunsuzluk yazma bilgisi	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), and (b) (6), (b) (7)	
Knowledge on conflict handling and interpersonal and intercultural communication Sorun çözme, iletişim yeteneği	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), and (b) (6), (b) (7)	
Spoken and written knowledge of English and preferrably German, French or Spanish İngilizce, Almanca, Fransızca veya İspanyolca okuma ve yazma yetisi olmalıdır.	Speaks and writes English at an pre intermediate level	

PART II for INSPECTOR QUALIFICATION

Inspections Kontroller	Performed (indicate units and inspection dates): Gerçekleşen (kontrol yerleri ve tarihlerini belirtiniz)		
Perform inspection under attendance, for 10 units Gözetim altında az 10 ünitenin kontrolünde bulunması	19.11.2014	çine ziraat odası	H. Özer
	23.10.2014	çine ziraat odası	H. Özer
	23.10.2014	çine ziraat odası	H. Özer
	24.10.2014	çine ziraat odası	H. Özer
	26.11.2014	çine ziraat odası	H. Özer
	26.11.2014	çine ziraat odası	H. Özer
	05.11.2014	karpuzlu koop.	(b) (6), (b) (7)(C)
	05.11.2014	karpuzlu koop.	
	04.11.2014	karpuzlu koop.	
	04.11.2014	karpuzlu koop.	
	06.11.2014	karpuzlu koop.	
	06.11.2014	karpuzlu koop.	
	03.11.2014	karpuzlu koop.	
	03.11.2014	karpuzlu koop.	
	28.10.2014	Tire- Bireysel	
	11.09.2014	çine ziraat odası	
	12.09.2014	çine ziraat odası	
	12.09.2014	çine ziraat odası	
	26.09.2014	çine ziraat odası	
	26.09.2014	çine ziraat odası	
	03.11.2014	karpuzlu koop.	
	04.11.2014	karpuzlu koop.	
	05.11.2014	karpuzlu koop.	
	06.11.2014	karpuzlu koop.	
	20.11.2014	çine ziraat odası	
	21.11.2014	çine ziraat odası	
	27.11.2014	çine ziraat odası	
APPROVAL OF HEAD INSPECTOR			

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
		TARİH	01.05.2014
		REV. NO	00
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NAME & SIGNATURE	DATE
Fatih AKSOY	28.11.2014
OFFICE MANAGER REVIEW	
NAME & SIGNATURE	DATE
(b) (6), (b) (7)	28.11.2014

 etko KONTROL ORGANİZASYONU	KONTROLÖR GÖZLEM RAPORU INSPECTOR MONITORING REPORT	BELGE NO	SP 05 F 01
		TARİH	01.05.2014
		REV. NO	00
		SAYFA	1 / 2

INSPECTOR MONITORED Subcontractor <input type="checkbox"/>	(b) (6), (b) (7)(C)	Head inspector <input type="checkbox"/>	Inspector <input checked="" type="checkbox"/>
THE LICENSEE NAME & #	Çine Ziraat Ocağı	No	2526
Duration of monitoring	From	20.11.2014	To
			20.11.2014

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri		✓		Çevre bilimi
Documentation available (regulations, Field manual...) Yönetmelikler vb, prosedürler, formlar, kontrolör el kitabı		✓		Yanında götürülmüştür
Introduction of the team Ekibin tanıtılması		✓		Yeterli
Confirmation of scope Kapsamın onaylanması	✓			Uygun
Explanation of visit Ziyaret için açıklama		✓		Yeterli değil detaylı açıklama
Explanation of reporting Raporlama yönteminin açıklanması		✓		Eksik
Opening and Closing Meetings Açılış ve kapanış toplantıları		✓		Yapılmadı
Knowledge of the product(s) Ürün bilgisi	✓			Yeterli
Knowledge about the processes Proses bilgisi			✓	çok ilave yok
Knowledge about the handling system İşleme sistemi bilgisi			✓	"
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet			✓	"
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet	✓			Uygun
Collection of objective evidence Nesnel kanıtların toplanması	✓			Nümuneler alındı
Application package review Başvuru paketi gözden geçirme		✓		Yapılmadı
Preparation of Application package review report Başvuru paketi gözden geçirme raporu		✓		

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

KONTROLÖR GÖZLEM RAPORU
INSPECTOR MONITORING REPORT

BELGE NO	SP 05 F 01
TARİH	01.05.2014
REV. NO	00
SAYFA	2 / 2

hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)		✓		Yapılmadı Gerekli senetler alınsa yds
Presentation of nonconformities Uygunsuzlukların sunulması		✓		Detaylı açıklanmadı
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			Uygun
Management of difficult situations Güç durumların çözülmesi	✓			Uygun
Team participation/communication Takımla uyum ve iletişim	✓			Barışık
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			Uygun
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		✓		Detaylı hızlı değerlendirildi
Leadership ability Liderlik yeteneği	✓			Uygun
Planning and time management Planlama ve zaman yönetimi		✓		Zamanı iyi kullandı
clothing giyim	✓			Uygun
Self confidence Kendine güven	✓			Yok

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi / eğitim gereksinimi olan alanlar ve nedenleri

Head Inspector (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	Date Tarih
		20.11.2014
Reviewed by Office Manager		Date
Rafik Aksoy		24.11.2014

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
		TARİH	01.05.2014
		REV. NO	00
		SAYFA	1 / 2

NAME	(b) (6), (b) (7)(C)	Inspector <input checked="" type="checkbox"/>	Subcontractor <input type="checkbox"/>
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Qualification for: Nitelendirme alanı <input type="checkbox"/> organic production agriculture: Türkiye de organic üretim <input type="checkbox"/> organic production processing: Türkiye de organic işletme <input type="checkbox"/> organic production and processing - international: Uluslararası organic üretim ve işletme <input type="checkbox"/> other:
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PART 1

Note: part 1 shall be filled by relevant personnel as the qualification proceeds

Requirements Gerekler	Training & Qualification Eğitim ve Nitelendirme	Approved Onay/tarih
Polytechnic or university degree in relevant subject (e.g. agriculture, food, forestry, textile) İlgili konularda üniversite diploması (ziraat, orman, gıda, tekstil vs)	Has graduated from the Ege University Agricultural (Plant Protect) department.	
Driver license Ehliyet	Available. B Licensee	
Relevant training and or certificate provided by ETO or Min. of Agriculture Tarım bakanlığı ve ETO tarafından verilen kurs veya katılım sertifikaları	Has attended several courses about Organik Farming, given by Dr. Mustafa AKYÜZ, Fatih AKSOY. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs	
General knowledge of organizational structure, internal communication, etc. Organizasyonel yapı iç haberleşme, bilgisi	Has been trained by (b) (6), (b) (7), (Head Inspector) about the general organization structure, internal communication.	
General knowledge on relevant certification programs Sertifikasyon programları bilgisi	Has been trained Mustafa AKYUZ (Gen. Man.) and Fatih AKSOY (Certifier) about the general trainings about certification procedures.	
Knowledge on quality system Kalite sistemi bilgisi	Has attended to the training on Quality System Manual and relevant procedures given by Dr. Mustafa AKYÜZ (quality management responsible)	
Knowledge on administration systems Yönetim sistemi bilgisi	Has taken courses on administration system by Dr. Mustafa AKYÜZ .	
Knowledge on relevant standards Geçerli yönetmelikler standartlara ilişkin bilgi	Has attended several courses about Organik Farming, given by Min. of Agriculture. Has an Inspector License approved by the Ministry of Agriculture and Rural Affairs. he has	
Knowledge on sampling Örneklemeyle ilgili bilgi	Practical course and applied training on sampling is given by ETKO (b) (6), (b) (7) (Head Inspector) and (b) (6), (b) (7)(C)	
Knowledge on certification programs and procedures and forms for certification/inspection	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	

	KONTROLÖR/PERSONEL NİTELENDİRME KAYIT FORMU INSPECTOR QUALIFICATION RECORD	BELGE NO	SP 05 F 02
		TARİH	01.05.2014
		REV. NO	00
		SAYFA	2 / 2

Sertifikasyon programları bilgisi	has been trained by QM on certification&inspection procedures.	
Knowledge on report writing, NCR writing... Raporlama, uygunsuzluk yazma bilgisi	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Knowledge on conflict handling and interpersonal and intercultural communication Sorun çözme, iletişim yeteneği	Has participated to the inspections demonstrated by ETKO Fatih Aksoy (Certifier) and (b) (6), (b) (7), (Head Inspector), (b) (6), (b) (7)(C)	
Spoken and written knowledge of English and preferrably German, French or Spanish İngilizce, Almanca, Fransızca veya İspanyolca okuma ve yazma yetisi olmalıdır.	Speaks and writes English at an upper intermediate level and he also speaks and writes Russian intermediate level	

PART II for INSPECTOR QUALIFICATION

Inspections Kontroller	Performed (indicate units and inspection dates): Gerçekleşen (kontrol yerleri ve tarihlerini belirtiniz)
Perform inspection under attendance, for 10 units Gözetim altında az 10 ünitenin kontrolünde bulunması	15.04.2014 de 2475 Meysan (b) (6), (b) (7)(C) 17.04.2014 de 2551 Aslanob 18.04.2014 de 2250 Dilek şe 29.04.2014 de 2009F-01a/104 Durm (b) (6), (b) (7)(C) 29.04.2014 de 2009F-01a/65 Ali On 29.04.2014 de 2009F-01a-16 Ercan 29.04.2014 de 2009F-01a/60 Battal 29.04.2014 de 2009F-01a/57 Cafer S 01.05.2014 de 2009F-01a-01 Hasan 01.05.2014 de 2009F-01a/37 Mustaf 01.05.2014 de 2009F-01a/43 Mustaf 01.05.2014 de 2009F-01a/76 Mehme 02.05.2014 de 2009F-01a-13 Mehme 02.05.2014 de 2009F-01a/72 Ali Çob 02.05.2014 de 2009F-01a/73 Musa Ü 14.05.2014 de 2475F-01-03 Cafer A 14.05.2014 de 2475F-01-24 Mehmet 17.7.2014 de 2453 Olıva – Fatih AK 21.07.2014 de 2316 Öcal – Fatih AK 07.08.2014 de 2389 Orhanlı projesi - 13.08.2014 de 2281 Menderes Yenik

APPROVAL OF HEAD INSPECTOR

NAME & SIGNATURE	DATE
Fatih AKSOY	30.12.2014

OFFICE MANAGER REVIEW

NAME & SIGNATURE	DATE
(b) (6), (b) (7)	30.12.2014

 KONTROLÖR GÖZLEM RAPORU INSPECTOR MONITORING REPORT	BELGE NO	SP 05 F 01
	TARİH	01.05.2014
	REV. NO	00
	SAYFA	1 / 2

INSPECTOR MONITORED	(b) (6), (b) (7)(C)	Head inspector	Inspector
Subcontractor <input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
THE LICENSEE NAME & #	Oliver	No	2453
Duration of monitoring	From 17.07.14	To	17.07.14

REQUIREMENTS Gereklilikler	SATISFACTORY	OBSERVATION	NOT COVERED	COMMENTS
knowledge of procedures Sertifikasyon prosedürleri konusundaki bilgileri		✓		Geliştirilmeli
Documentation available (regulations, Field manual...) Yönetmelikler vb. prosedürler, formlar, kontrolör el kitabı		✓		Formlara ve Yönetmeliklere bakılarak, Yönetmelikler, Yönetmelikler, Yönetmelikler
Introduction of the team Ekibin tanıtılması	✓			Yapıldı
Confirmation of scope Kapsamın onaylanması	✓			Yapıldı
Explanation of visit Ziyaret için açıklama	✓			Uygun
Explanation of reporting Raporlama yönteminin açıklanması	✓			Yapıldı
Opening and Closing Meetings Açılış ve kapanış toplantıları		✓		Yapıldı, fakat daha rahat olmalı
Knowledge of the product(s) Ürün bilgisi		✓		Geliştirilmeli
Knowledge about the processes Proses bilgisi		✓		Geliştirilmeli
Knowledge about the handling system İşleme sistemi bilgisi		✓		Geliştirilmeli
Knowledge about the legislation and standards İlgili yönetmelik vs hakimiyet		✓		Yönetmelikte eğitim yapılmalı
Knowledge about relevant technical aspects of evaluation Değerlendirmeye ilişkin teknik konulara hakimiyet		✓		Bu mesur ve yönetmeliklerde elverişli
Collection of objective evidence Nesnel kanıtların toplanması		✓		Bu nedenle gözetim başlanmalıdır
Application package review Başvuru paketi gözden geçirme	✓			Yapıldı, önceki rapor incelenmiş
Preparation of Application package review report Başvuru paketi gözden geçirme raporu	✓			Yapılmış

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

KONTROLÖR GÖZLEM RAPORU
INSPECTOR MONITORING REPORT

BELGE NO SP 05 F 01
TARİH 01.05.2014
REV. NO 00
SAYFA 2 / 2

hazırlama				
Preparation for inspection (e.g. reading latest report, asking for forms, etc) Hazırlanma (en son raporu inceleme, formların hazırlanması vs)	✓			En son kontrol raporu - miz, basımların po ketr değerlendirilmiş
Presentation of nonconformities Uyumsuzlukların sunulması	✓			Uyumsuz, teşahh ve işi genel olarak
Objectivity and confidentiality Tarafsızlık ve sır saklama	✓			Uygun
Management of difficult situations Güç durumların çözülmesi	✓			Uygunluklar nurunu başarılı
Team participation/communication Takımla uyum ve iletişim	✓			iş
Attitude and communication with licensees Müşterilerle iletişim ve davranış	✓			iş
Reporting (timeliness and quality) Raporlama (zamanlama ve kalite)		✓		ETKO projelerinde yönetimlik ve işleme sistem bilgisi gelip işe dahi
Leadership ability Liderlik yeteneği	✓			iş
Planning and time management Planlama ve zaman yönetimi		✓		Ekibin zaman planı yapılmadı
clothing giyim	✓			Uygun
Self confidence Kendine güven	✓			iş

Comments by Head Inspector/training opportunities

Gözlem yapan kontrolörün genel değerlendirmesi /eğitim gereksinimi olan alanlar ve nedenleri

Avuç departmanında zaman planı yapılmadı, projesinde
Yönetimlik ve işleme sistem bilgisi eksikliği ve

Head Inspector Baş kontrolör	Signature İmza	Date Tarih
Fatih ANSOY	[Signature]	17.07.2014
Reviewed by Office Manager	Signature	Date
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	17.07.2014

Certified Agent Training

Topic: Periodic Residue Testing

January 15, 2013

Miles McEvoy

USDA Agricultural Marketing Service
National Organic Program





Today's Learning Objective:

Learn what to do if your tests show residues of a prohibited substance(s)

Final Rule for Periodic Residue Testing



Beginning January 1, 2013:

- Certifying agents must test products from at least 5 percent of the operations they certify each year.
- Program will help certifying agents identify and take enforcement action against farms and businesses using prohibited substances or methods, such as:
 - Prohibited pesticides
 - Antibiotics
 - Synthetic hormones
 - Genetic engineering

Detected Pesticide Residues on final product



Three possible references if residues are detected

Pesticide
Residue

- U.S. Environmental Protection Agency (EPA) Tolerance Level established for the tested sample

Pesticide
Residue

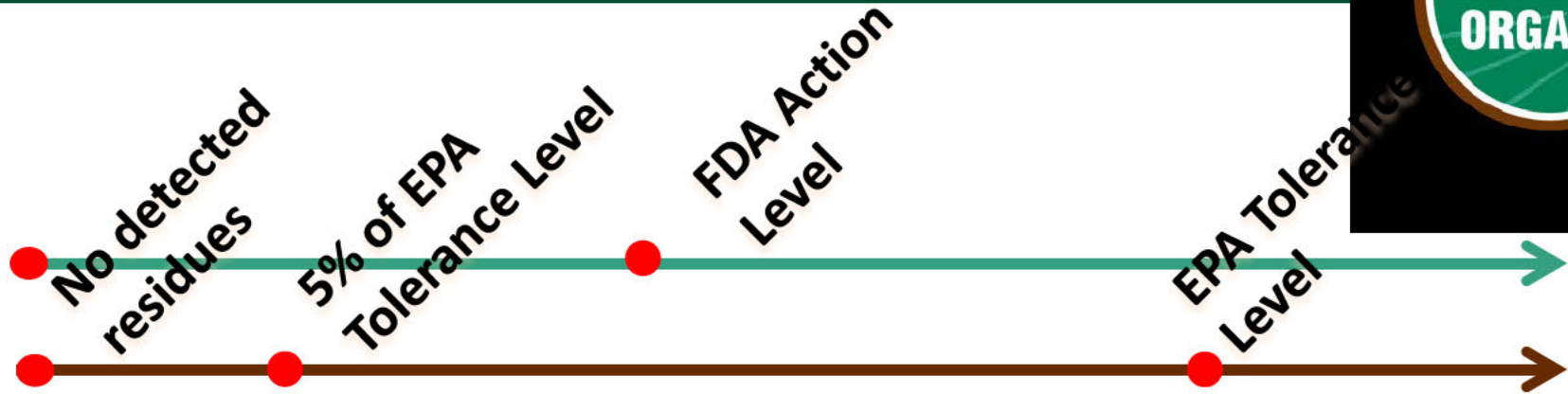
- Food and Drug Administration (FDA) Action Level (AL) established for the tested sample

Pesticide
Residue

- No tolerance or action level

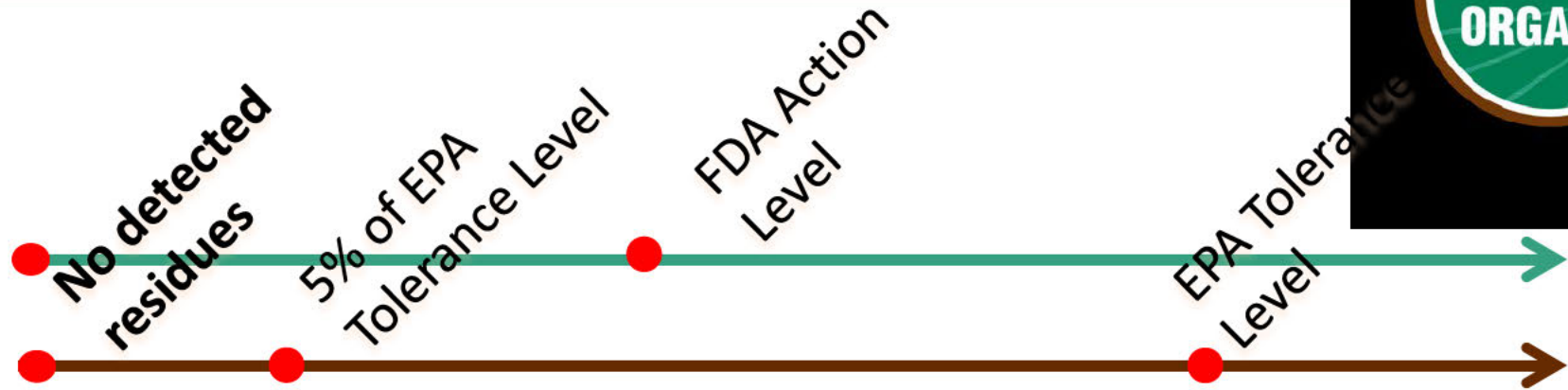
NOTE: Action levels only exist for edible crops and products. Other sample sources, such as soil or leaves, do not have established tolerance or action levels at this time.

Action levels and tolerance levels



- **EPA** establishes tolerance levels for registered pesticides allowed to be applied on specific crops
- **EPA** tolerances are applicable to specific crops; if there is no registered use for the crop, then the EPA sets no tolerance for the pesticide on that crop
- **FDA** sets action levels for older pesticides that are no longer EPA registered but are still persistent in environment

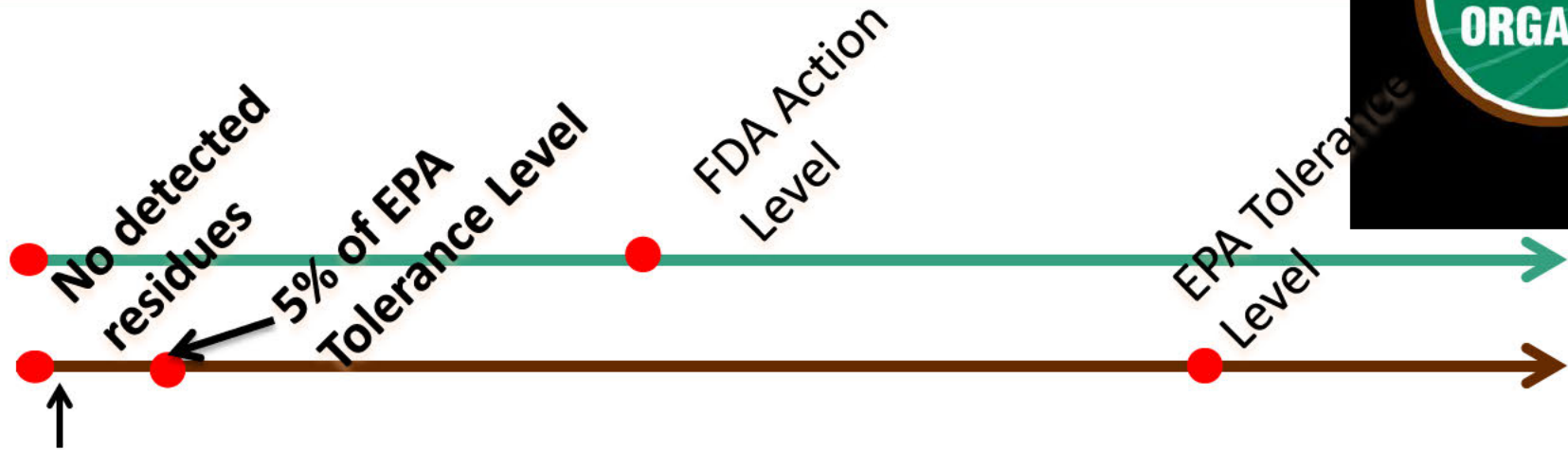
1. No Residue Detected



No residues detected:

- The product may be sold as organic.
- The certifying agent will notify operator of test results.
- The certifying agent will maintain records of analysis and provide results to the public upon request.

2. Residues at or less than 0.01 ppm (trace)



**Residues detected at or less than 0.01 ppm (10 ppb)
BQL – Below Quantifiable Levels or LOD – Limit of Detection**

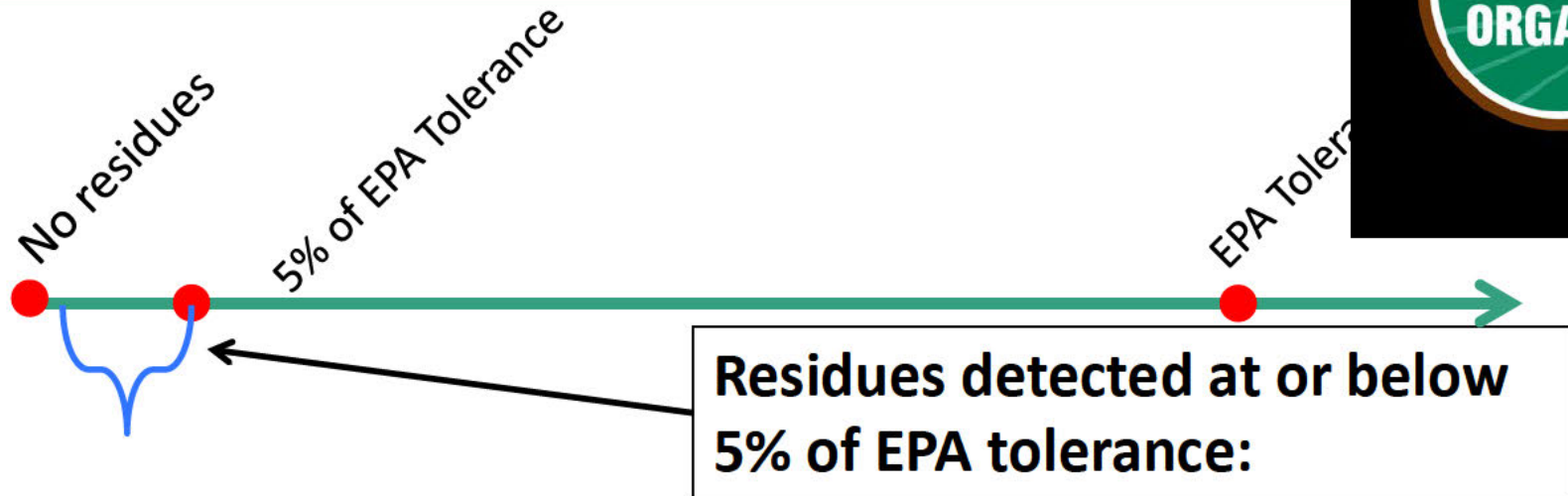
- The product may be sold as organic.
- The certifying agent will notify operator of test results
- Assess why the residue is present and follow up with operation as appropriate.
- Maintain records of analysis and provide results to the public upon request.

3. Residue samples detected at or below 5% of EPA tolerance



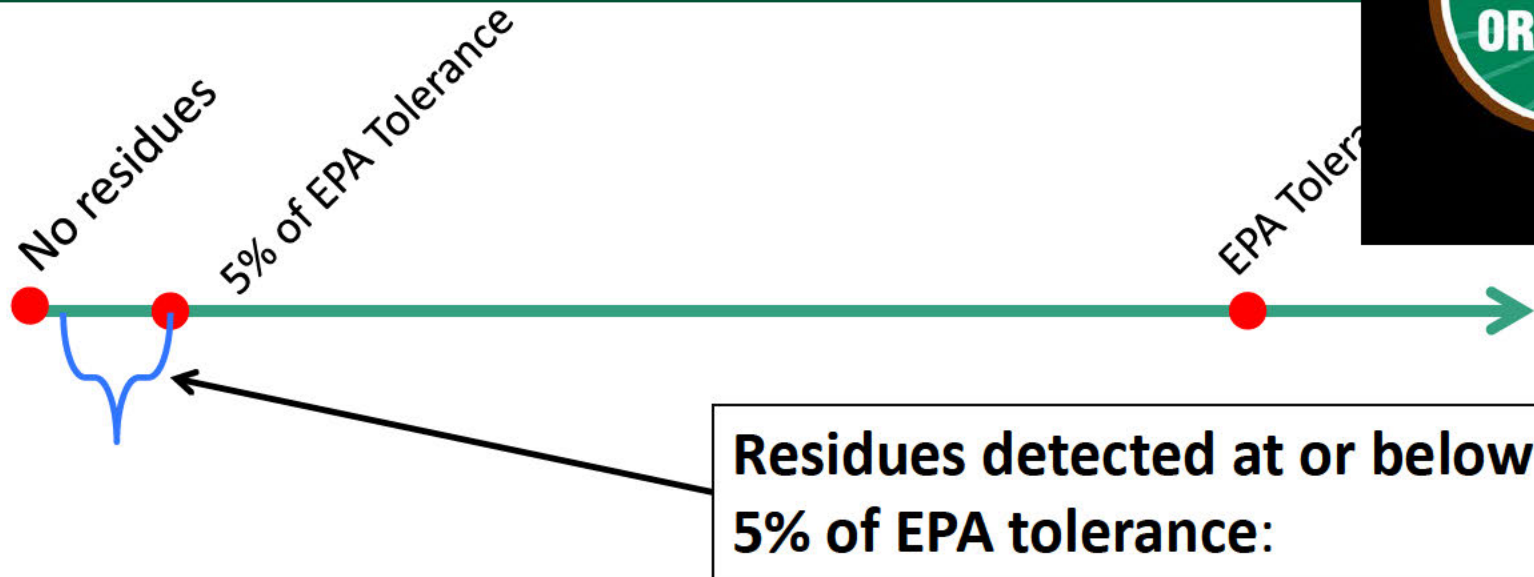
- The certifying agent will notify the operator of test results.
- The product may be sold as organic if residues are not a result of application of prohibited pesticides or commingling.

3. Residue samples detected at or below 5% of EPA tolerance continued



- The certifying agent will investigate why residues are present
- If residue presence is determined to be due to inadequate buffer zones or inadequate management practices to prevent commingling or contact with prohibited substances, issue an Notice of Noncompliance and require corrective actions to prevent future contamination.

3. Residue samples detected at or below 5% of EPA tolerance continued



- If **evidence of intentional** application of prohibited substances is found, the certifying agent should propose suspension or revocation of certification.
- The certifying agent may coordinate adverse actions with the NOP.

4. Residue samples detected greater than 5% of EPA tolerance, but not above the EPA tolerance level.



Residues detected greater than 5% of EPA tolerance, but not above the EPA tolerance level:

- The certifying agent will **immediately** notify the NOP or State Organic Program, if applicable, of test results.
- The product **may not** be sold as organic.

4. Residue samples detected greater than 5% of EPA tolerance, but not above the EPA tolerance level



Residues detected greater than 5% of EPA tolerance, but not above the EPA tolerance level:

- Investigate why residues are present
- Issue a Notice of Noncompliance for violation of having prohibited substances at levels greater than 5 percent of the EPA tolerance level.

4. Residue samples detected greater than 5% of EPA tolerance, but not above the EPA tolerance level



Residues detected greater than 5% of EPA tolerance, but not above the EPA tolerance level:

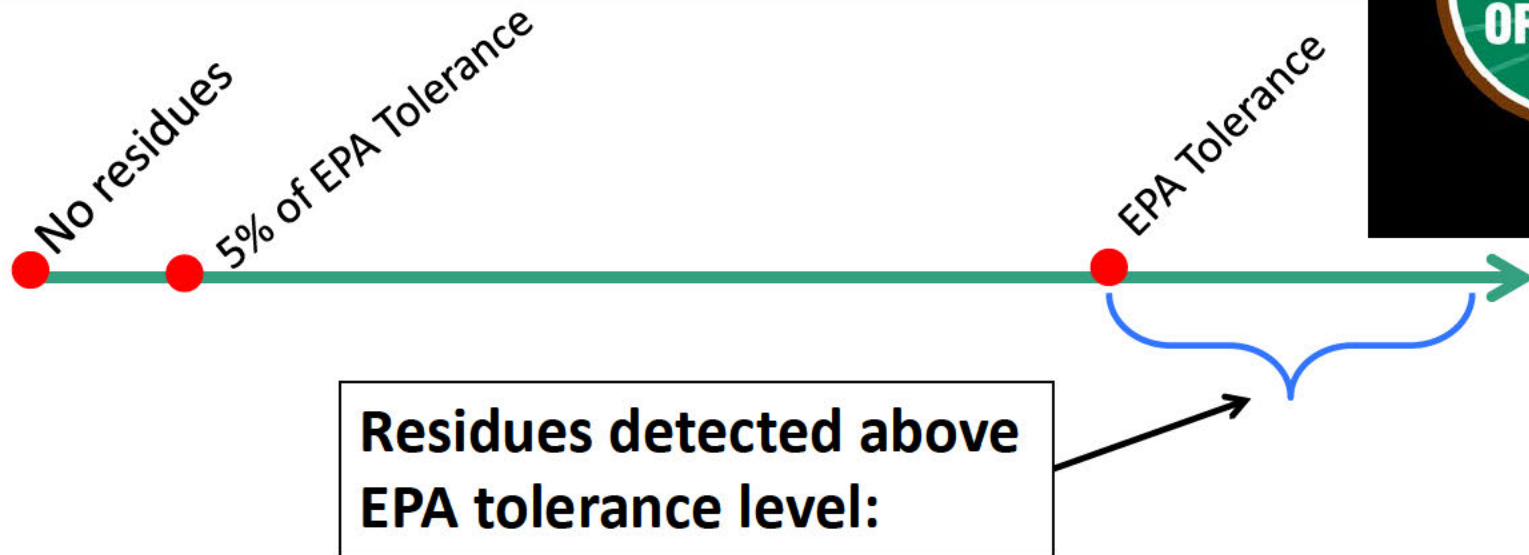
- If application of prohibited substances is found, the certifying agent should propose suspension or revocation of certification.
- The certifying agent **should** coordinate adverse actions with the NOP.

5. Residue samples detected above EPA tolerance level.



- ***Immediately*** notify the NOP, EPA, state food safety programs or foreign health agency (if outside the U.S.)
- The product **may not** be sold as organic.
- Investigate why residues are present and issue a Notice of Noncompliance for violation of having prohibited substances at levels greater than the EPA tolerance level.

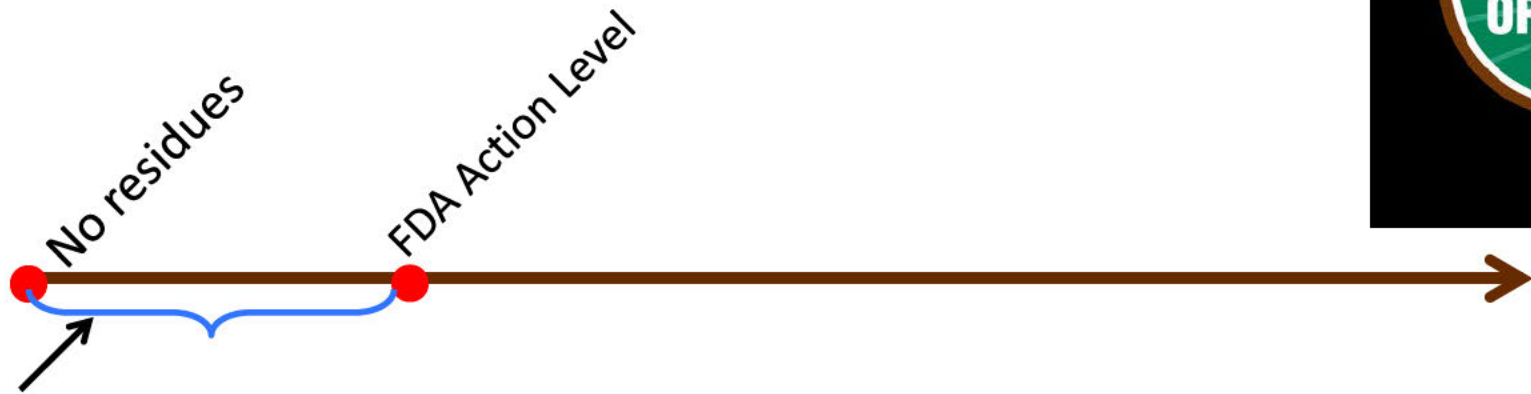
5. Residue detected above EPA tolerance level continued



- The certifying agent will follow adverse action procedures.
- The certifying agent **should** coordinate adverse actions with the NOP.
- NOP may pursue civil penalties.



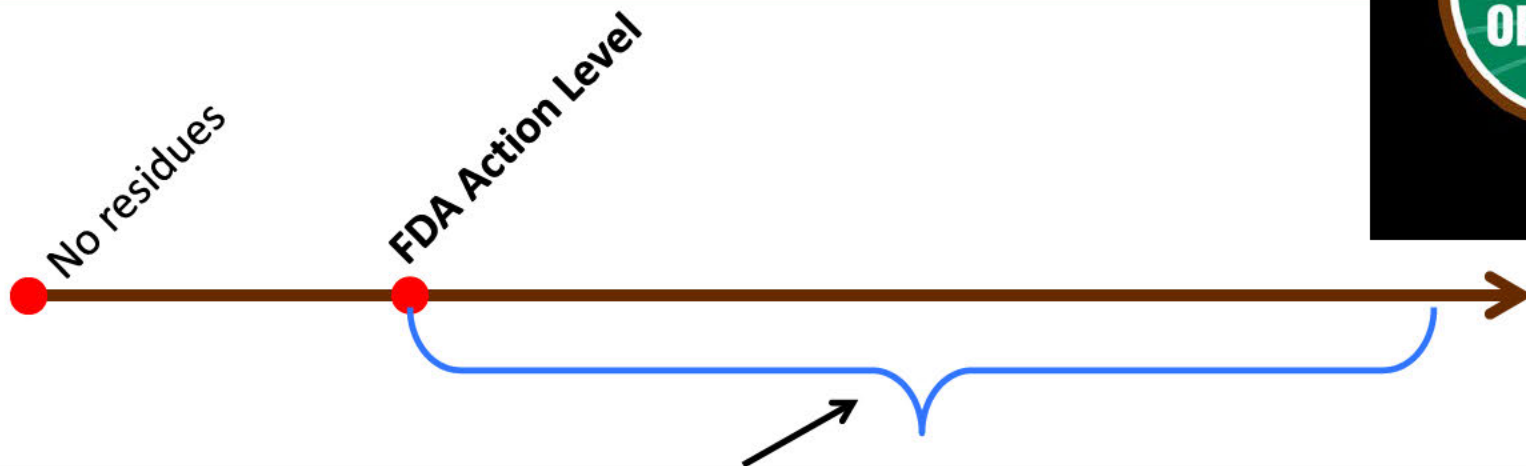
6. Residue detected below FDA Action Level



When there is no EPA tolerance level established for the tested residue sample, but the residue is below the FDA Action Level:

- The certifying agent will notify the operator of test results.
- The certifying agent will investigate why residues are present to determine if residues are a result of application of prohibited pesticide or were due to unavoidable residual environmental contamination.
- The product may be sold as organic if residues are not a result of the application of prohibited pesticides, commingling or contamination during handling.

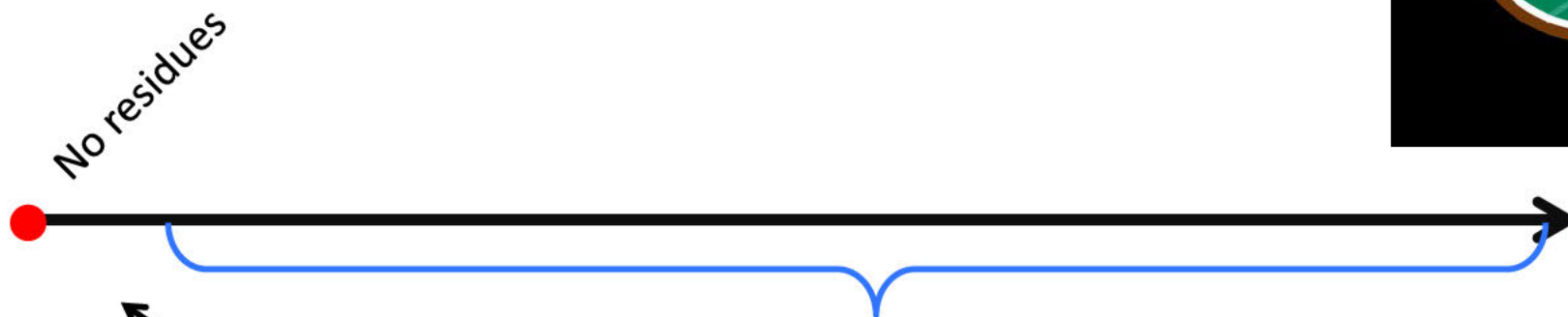
7. Residue detected at or above the FDA Action Level



When residues are detected at or above the FDA Action Level:

- ***Immediately*** notify the NOP, FDA, state food safety programs, and/or foreign health agency (if outside of U.S.).
- Investigate why residues are present.
- Product may not be sold as organic.
- Work with NOP to identify violations and take enforcement action.

8. Residue detected with no EPA tolerance or FDA Action level



Residues detected at or above 0.01 ppm with no EPA tolerance or FDA action level:

- The certifying agent will immediately notify the NOP, FDA, state food safety programs, and/or foreign health agency (if outside of U.S.).
- Product may not be sold as organic.
- Investigate why residues are present and issue a Notice of Noncompliance for possible violations, if applicable.



U.S. EPA Pesticide Tolerances

- <http://www.epa.gov/pesticides/regulating/tolerances.htm>

European Organic Certifiers Council task force residues – Guidance document for the certification decision making process

- http://www.eocc.eu/home/pdf/survey_guidelines/AS_EOCC_Pesticide_Guidelines_version_Sept_2012.pdf

EOCC task force residues



- Risk based approach and sampling
- Effective sampling determined by three parameters
 - At the right place
 - The right product
 - At the right time
- Guidance on distinguishing use from contamination or commingling



- **US EPA Index to Pesticide Chemical Names, Part 18**
Tolerance Information
<http://www.epa.gov/opp00001/regulating/tolerances-commodity.pdf>
- **FDA Guidance for Industry: Action Levels for Poisonous or Deleterious Substance in Human Food and Animal Feed**
<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ChemicalContaminantsandPesticides/ucm077969.htm>

Examples



- **0.05 ppm chlordane on winter squash**
 - No EPA tolerance level
 - FDA Action Level = 0.1 ppm
 - Investigate and take appropriate action
 - If chlordane was not applied, the product may be sold as organic
- **0.2 ppm DDE on tomatoes**
 - No EPA tolerance level
 - FDA Action level = 0.05 ppm
 - Product cannot be sold as organic
 - Notify FDA and NOP, coordinate investigation

Examples



- **0.2 ppm Metalachlor on buckwheat**
 - EPA tolerance – 0.1 ppm
 - Exceeds EPA tolerance
 - May not be sold as organic
 - Notify EPA if field sample, FDA if non-field sample
 - Notify NOP, investigate and take appropriate action
- **1 ppm Chlorpropham on potatoes**
 - EPA tolerance = 30 ppm
 - Less than 5% EPA tolerance level
 - Investigation indicates operation knowingly used CIPC (chlorpropham) for sprout inhibition
 - Appropriate adverse action – combined NONC/NOPR

Sampling results: actions



For all sample results:

- Notify applicant or certified operation of test results.
- Maintain records of analysis and provide results to the public upon request.
- Maintain sample collection information and sample results for review during NOP accreditation audits.
- When residues are found, investigate why residues are present and take enforcement action as appropriate.

Reporting test results to authorities



In the U.S., report test results that indicate violations of EPA and FDA regulations as follows:

- Notify the EPA if the violation of the EPA regulation can be traced back to a prohibited application of a pesticide in a field in the U.S.
 - A prohibited application occurred if a pesticide was applied but was not permitted to be applied to a particular crop (i.e. there is no EPA tolerance) or a pesticide was applied at levels that were too high for a particular crop (i.e. above the tolerance).
- Submit notice of such EPA violations to www.epa.gov/tips/.

Reporting test results to authorities



- Notify the FDA of violations of the EPA tolerance level action levels when :
 - The product that was tested is in the stream of commerce, and
 - The location and time of violation that may have occurred in a field cannot be determined.
- Report notice of such violations to the FDA district office where the violation was discovered.
- To find Information on district offices, go to:
www.fda.gov/food/foodsafety/foodsafetyprograms/rfr/default.htm

Responding to detected residues other than pesticide residues



Antibiotics, hormones, medications, GMO

Investigate to determine source of residues and take appropriate adverse action.

- Use of prohibited substance or method:
 - Knowingly, willful, reason to know = Proposed Revocation
 - Inadvertent, Error = Proposed Suspension
- Inadequate measures to prevent contamination or commingling:
 - Notice of Noncompliance: require corrective actions to mitigate future contamination.

Responding to detected sample residues other than pesticide residues



Example: GMO residues

- The NOP regulations prohibit the use of genetically modified organisms, prohibit commingling or contamination during processing and handling, and require preventative practices to avoid contact with genetically modified organisms (GMOs).
- Organic agricultural products should have minimal, if any, GMO presence.
- However, no tolerance level has been established for the presence of GMO material.

Responding to detected sample residues other than pesticide residues



GMO residues, continued

- If investigation determines that the residue levels indicate use of excluded methods, then take adverse actions to suspend or revoke certification.
- If investigation determines that the residue levels are due to inadequate measures to avoid contact with excluded methods from adjoining land use or commingling, then issue NONC. Corrective actions must include measures to mitigate contamination.

Final Rule for Periodic Residue Testing



Review:



Test Results-
Provide copy to operator and make
available to public



Investigate positive results to
determine source



Take appropriate action: adverse actions
and notification of authorities

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014
		REV NR:

Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
06.02.2014	ETKO	Inspectors	Fatih AKSOY	Label regulations according to TC-NOP-EU	Fatih AKSOY prepared training
10/11.02.2014	Cologne / Germany	Mustafa AKYUZ	Magdalena Traxinger	Globalgap General Regulations Version 4.0.Review 2013,Innovations,Risk Analysis,Residu Monitoring,CIPRO Audits,CCP,New Documents,Organization	Training prepared by Globalgap Magdalena Traxinger
26.03.2014	ETKO	Inspectors	Fatih AKSOY	Opening and Closing Meeting management, Sampling, Presentation and Reporting of nonconformities	Fatih AKSOY prepared training
3/5.03.2014	Serbia	Milenko Kosutic, Irena Djokic, Zoran Stamnekovic, Goran Djokic, Goran Pivnicki	Fatih AKSOY	Annual, training and witness audit SERBIAN OPERATION 2014 (EU, NOP)	Fatih AKSOY prepared training
14.04.2014	ETKO	Inspectors	Fatih AKSOY M.Ali KÖSEM Burak GÜRBÜZ Yuşa YÜN	TC and EU Regulation changes, GOTS ginning,İnspection reports of deficiencies in control, NOP 2610 Sampling Instructions	Training prepared by Fatih AKSOY M.Ali KÖSEM Burak GÜRBÜZ Yuşa YÜN

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014 REV NR:
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Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
15.04.2014	ETKO	Erol Sinan Fatih Aksoy Sinan Yılmaz Devrim Vural Memet Yüce Ekinci Hüseyin Özer Durmuş Güngör Yuşa Yün Burak Gürbüz	Fatih AKSOY	Organic farming legislation updating education	Training prepared by Fatih AKSOY
30.04.2014	ETKO	Fatih AKSOY M.Ali KÖSEM Mustafa Akyüz	Marcus BRUEGEL	GOTS Version 4.0 Relevant changes and their implementation(Online Training)	Marcus BRUEGEL prepared training
22.05.2014	ETKO	Advisory Committee Members, Inspectors	Levent KAHRIMAN Mustafa K. Sangün	COSMOS STANDARD Objectives of Cosmos Standard EU and Turkish Legislation for Cosmetic Products European Directive 76/768/EEC EU Reach Regulation – 19/07/2006 Scope and Definitions Precautionary principle such as	Training prepared by Levent KAHRIMAN Mustafa K. Sangün

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014 REV NR:
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Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
				Nanomaterials, GMO, Irradiation and Animal Testing Origin and processing of ingredients Composition of total product Storage, Manufacturing and Packaging Environmental Management Labelling Inspection & Certification and approval of ingredients Physical Processes Allowed Chemical Processes Allowed for Processing Agro Ingredients Not Allowed Processes Ingredients of Mineral and Other Origin Allowed	
23.05.2014	ETKO	Advisory Committee Members, Inspectors	DV	Organic Livestock requirements, ETKO Inspection and Certification procedures. How to do inspection for organic producers and processing facilities for livestock and vegetables, fruits and arable crops. Inspection	Devrim Vural prepared training

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014
		REV NR:

Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
				forms and reporting	
27.05.2014	ETKO	Advisory Committee Members, Inspectors	M. Ali KÖSEM	GOTS and OCS Standards, Inspection Criteria, Inspection of textile units, example ginning/spinning/weaving factories	M. Ali KÖSEM prepared training
13.06.2014	ETKO	Advisory Committee Members, Inspectors	Fatih AKSOY	Studying TC 27676, and EC Equivalent Standard, NOP. Inspection and Certification procedures. How to do inspection for organic producers and processing facilities. Inspection forms and reporting.	Fatih AKSOY prepared training
01-12.07.2014	Romania	Shapera Dumitru, AC and Inspector	MA	EC Regulation, Romanian Legislation, Bee-keeping, Site Visits Internal Audit and Management Review	Mustafa Akyüz prepared training

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014 REV NR:
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Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
04.07.2014 – 10.07.2014	ETKO Novi Sad- Blace	ETKO Personnel	FA + DV+MA	Office Administration, Corrective actions to ATS Audit, Inspection skills, Sampling, Paralel cropping, Field register book, Contamination possibilities, Soil and product analyses Propagation material rule Farm and processing inputs such as fertilizers, pest-disease control, processing aids, dairy farming etc.. Serbian Regulation, EC Regulation, NOP Regulation, Monitoring inspection. Management review, Internal Audit Investigation of Irregularities and Exchange of Information	Training prepared by Fatih AKSOY, Devrim VURAL, Mustafa AKYÜZ
24.07.2014	ETKO	Mustafa Akyüz	Global GAP	Global GAP online training	Training prepared by Global GAP
25.07.2014	ETKO	Sinan Yılmaz	Global GAP	Global GAP online training	Training prepared by Global GAP

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014
		REV NR:

Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
19-21.08.2014	ETKO-UKRAINE	Vasyl GECHU, Artem CHERNYSH	MA+YY	Expalining general changes in regulations and ETKO Sanction policy, Private Standards Procedure NOP, EC, EEUOPPSFTC, Investigation of Irregularities, Exchange of Information, Risk Assessment. Sampling Method	Training prepared by Mustafa AKYÜZ, Yusa YUN
20.08.2014	ETKO	Fatih Aksoy	Global GAP	Global GAP online training	Training prepared by Global GAP
22.08.2014- 26.08.2014- 10.09.2014	ETKO	Burak Gürbüz	Global GAP	Global GAP online training	Training prepared by Global GAP
18.09.2014	ETKO	İlhan Yılmaz, Yunus Güzel, Süleyman Güçlü	Fatih AKSOY	Organic agriculture control preparation - Control process	Training prepared by Fatih AKSOY
23/24.09.2014	Cologne /	Mustafa AKYÜZ	Dr. Kristian Moeller	GLOBALGAP Scheme Manager Update Training	Training prepared by GLOBALGAP, Dr. Kristian

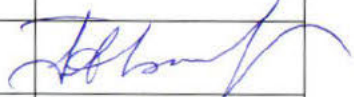


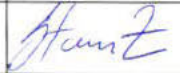

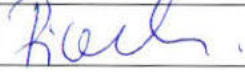
	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014 REV NR:
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Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
	Germany				Moeller
25.09.2014	Cologne / Germany	Sinan Yılmaz, Fatih Aksoy	Dr. Kristian Moeller	GLOBALGAP CB OP-2 Auditor Training for Group Certification- V4	Training prepared by GLOBALGAP, Dr. Kristian Moeller
04.10.2014	ETKO	Mustafa Akyüz, Fatih Aksoy, Sinan Yılmaz, Mehmet ali Kösem, İbrahim Duman, Hakan Pamuk, Hakan Karabacak, Levent Kahrıman, Aylin Uğur, Akın Türe, M. Yüce Ekinci, Durmuş Güngör, Hüseyin Özer, Uğur Özbilir, Ekrem Güler, Erol Sinan, Engin Özercan	Mustafa AKYUZ Fatih AKSOY M. Ali KÖSEM Ekrem GÜLER	Investigation Irregularities and reporting, case study Deniz Tarım, Risk Assessment acc EC Reg. Exchange of Information Differences between Organic regulations (TC-EU-NOP) GOTS and OCS standard COSMOS Regulation and cosmetics production methods	Training prepared by Mustafa AKYUZ Fatih AKSOY M. Ali KÖSEM Ekrem GÜLER
07.11.2014	ETKO	Sinan Yılmaz Fatih Aksoy Burak Gürbüz	Mustafa AKYÜZ Sinan YILMAZ	GLOBALGAP Version 4 Integrated Farm Assurance Fruit and Vegetables Control Point Compliance Criteria	Training prepared by Mustafa AKYÜZ Sinan YILMAZ
10/21.11.2014	Ankara / TURKEY	Fatih Aksoy	TSE (Turkish	GAP (Good Agriculture Practices Auditor in Plant Production)	Training prepared by

	ETKO ANNUAL TRAINING and PARTICIPATION YILLIK EĞİTİM VE KATILIM PLANI	Date of Issue: Yayın Tarihi: January 2014
		REV NR:

Tarih-Date	Adress	Katılımcı- Participants	Eğitmen - Trainor	Konu - Subject	Yorum - Comment
		Burak Gürbüz	standarts Institution)		TSE (Turkish standarts Institution)
22.12.2014	ETKO	Fatih Aksoy, Sinan Yılmaz, Mehmet ali Kösem, Öznur Kılınç, Ömür Demirkaya, Göksan Nadas, Yasin Serin, Yuşa Yün, Süleyman Güçlü, Ekrem Güler, Hüseyin Özer, Burak Gürbüz, Ekrem Güler, Erol Sinan	Uğurcan Karaçelik	Otbis and TBS	Uğurcan Karaçelik prepared training

ETKO PANONIJA -OBUKA OSOBLJA 2014.

No	Prezime i ime	Pozicija	Kompanija	Adresa	Tel-Fax-Email	Signature
1	Fatih Aksoy	Trener	ETKO	Trg slobode 3	0232-339 7606	
2	Milenko Kosutic	Glavni menadzer	ETKO PANONIJA	Trg slobode 3	+381-694 439 800	
3	Irena Djokic	Glavni Kontrolor	ETKO PANONIJA	Trg slobode 3	+381-669 013 645	
4	Zoran Stamenkovic	Kontrolor pripravnik	ETKO PANONIJA	Trg slobode 3	+381-642 674 021 (b) (6)	
5	Goran Djokic	Clan nadzorne komisije	ETKO PANONIJA	Trg slobode 3	+381-637 042 779 (b) (6)	
6	Goran Pivnički	Clan nadzorne komisije	ETKO PANONIJA	Trg slobode 3	381-64 10705 (b) (6)	



Predavači: Fatih Aksoy

ETKO PANONIJA-Novu Sad:---03-05.03.2014.

ETKO SERBIA ACTIVITY REPORT March -2014

Training - Witness Audit –Monitoring of Serbian Operation (Milenko KOSUTIC, Irena DJOKIC, Advisory Committee members; Goran PIVNICKI and Goran DJOKIC)

Date: 03-05 March 2014

Trainer: Fatih AKSOY (ETKO Ltd-İzmir – TURKEY)

03.03.2014 Training ETKO personnel for EC Reg (new changes) and NOP Regulations

04.03.2014 On site inspection training and Inspector Monitoring (Irena Djokic)

05.03.2014 Training ETKO personnel; Writing of Inspection Report.

03.03.2014: Meeting ETKO office Novi Sad and program.

Participants Milenko Kosutic, Irena Djokic, Goran Djokic.

Topics studied as follows according to, EC and NOP Regulations:

Parallel Cropping,

Record keeping, input output balance

Contamination possibilities

Soil and product analyses

Propagation material rule

Farm and processing inputs such as fertilizers, pest-disease control, processing aids

Analyses and sampling methods

04.03.2014: On Site Inspection to Ekoland Farm,

monitoring Irena Djokic:

10.00 Opening meeting: The scope was identified and explanation of the inspection program.

10.30 – 16.00 document and system inspection: OCP- was checked and all sections were cross-checked with the findings during the site visit. OCP Related documentation and programs were as well inspected carefully.

16.00 – 17.00 closing meeting: Findings of the audit was explained.

05.03.2014: Training ETKO personnel: Participants Milenko Kosutic, Irena Djokic, Goran Djokic and Goran PIVNICKI

Filling of the Inspection forms and Inspection reports according to EU and NOP regulations

Prepared by Fatih AKSOY

05.03.2014



Standards Update

February 19, 2014

USDA Agricultural Marketing Service
National Organic Program



Today's Learning Objectives



1. Review changes to the National List of Allowed and Prohibited Substances.
2. Highlight four policies published in 2013 on Standards related issues.

Key points for certifiers: National List changes



Quick Review: National List Handout

- Allowance for peracetic acid in hydrogen peroxide formulations.
- Commercial availability for silicon dioxide.
- Implementation periods for silicon dioxide change and annatto extract removal.

Other National List Issues



- **205.605(b) – Nutrient vitamins and minerals**
 - September 2012 Interim Rule
 - Status Quo
- **205.602 – Sodium Nitrate**
 - September 2012 Notice
 - “Expired” from 205.602
 - Must meet soil fertility and crop nutrient standard; natural resource standard

NOP 5027 The Use of Kelp in Organic Livestock Feed



- States that kelp is agricultural.
- States that kelp can be certified as a wild crop.
- Certifiers should verify that kelp is organic when used in livestock feed as of March 4, 2014.

NOP 5029 Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production



- Clarifies what an “equivalent organic variety” is for the purpose of verifying commercial availability.
- Reiterates planting stock must be managed for one year before planting stock can be sold as organic.
- Clarifies substances that certifiers should review (e.g. pesticides on seeds) and which substances certifiers do not need to review (e.g. those used on non-organic planting stock prior to purchase and use of stock by organic grower).

NOP 5030 Evaluating Allowed Ingredients and Sources of Vitamins and Minerals in Livestock



- Clarifies that agricultural ingredients in feed products (e.g., molasses), including ingredients on label for premixes/bulk, must be organic.
- Specifies certain sourcing requirements for minerals and vitamins approved by FDA/AAFCO (e.g., no minerals from bone meal).
- Clarifies that certifiers do not need to review ingredients (e.g., preservatives) within individual vitamins and minerals approved by FDA/AAFCO definition (e.g., vitamin A supplement).
- Explains issues around certification of feed additives.

Policy Memo 13-1:

Cell Fusion Techniques Used in Seed Production



- This policy gives guidance to seed companies and plant breeders about what techniques are prohibited.
- Describes a range of cell fusion techniques and whether a given technique is considered an excluded method and, thus, prohibited.
- Certifiers should verify that producers are documenting that seeds are not genetically modified (e.g., through affidavits).



Policy Memo 11-4: Evaluation of Materials

- Policy Memo 11-4 issued in 2011 to provide options to certifiers to recognize reviews completed by third parties
- Updated August 6, 2013 to clarify how NOP will resolve instances when certifiers and material evaluation programs disagree on the allowance of a specific input

Policy Memo 11-4: Evaluation of Materials



- Why was the update needed?
 - Inputs are often reviewed by multiple parties, including multiple certifiers and material evaluation programs
 - Occasionally, certifiers and material evaluation programs reach different conclusions whether a product is allowed, leading to inconsistency and confusion

Policy Memo 11-4: Evaluation of Materials



- New certifier responsibilities:
 - Notify NOP if you review a product and determine that it does not comply *and* the label or supporting documentation indicates it has been approved by another certifier or material evaluation program
 - Example: a certifier reviews a fertilizer product and determines that it does not comply. The product label includes a logo that indicates it is approved for organic use by another organization.
 - Information must be submitted to NOP.Guidance@ams.usda.gov or your NOP Accreditation Manager

Policy Memo 11-4: Evaluation of Materials



- What types of reviews are impacted?
 - Reviews of brand name input products, including fertilizers, soil amendments, pesticides, livestock inputs, handling substances
 - Does not include organic products from certified operations

Policy Memo 11-4: Evaluation of Materials



- What is NOP's process?
 - Upon notification, NOP will contact the certifiers or material evaluation programs involved and request information
 - NOP will review responses from both parties and determine whether the regulations have been properly applied
 - NOP's decision is limited to the application of the USDA organic regulations

Policy Memo 11-4: Evaluation of Materials



- If the product does not comply:
 - NOP will notify the certifier or material evaluation program that it must rescind its approval of the product
 - NOP will communicate the determination to all certifiers and material evaluation programs with a timeline, if appropriate, for discontinuation of use by certified operations

Policy Memo 11-4: Evaluation of Materials



- What about previous use by operations
 - A decision made by certifying agents and reputable third party sources about the status of a branded (formulated) product remains in effect until the NOP notifies all certifying agents and material evaluation programs about the status of a material under the regulations

Policy Memo 11-4: Evaluation of Materials



- What does not need to be reported to NOP?
 - Differences in interpretation between a certifier and its certified operations
 - Differences in interpretation between a certifier and an input manufacturer

Policy Memo 11-4: Evaluation of Materials



- Minimizing conflicting interpretations:
 - NOP is developing final guidance on classification and materials for organic crop production
 - If you are unsure whether a generic ingredient or input complies, contact your NOP Accreditation Manager before issuing approval
 - NOP has established a cross-divisional Materials Team to address gray areas, as needed

Policy Memo 11-4: Evaluation of Materials



- Example: Humic acid extraction
 - Question from material evaluation program on whether humic acid products can be extracted with ammonium hydroxide
 - The material evaluation program indicated these products were already allowed by others, but was unclear whether this use was allowed by the regulations
 - NOP issued Policy Memo 13-2 to clarify
 - No previously approved products were determined to be non-compliant

The Use of Natural Flavors



Can natural flavors be used for the purpose of “fragrance” in personal care products (e.g., body lotion)?

Answer – no; already covered in NOP policy memo.

- 7 CFR 205.605(a): “Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative”
- Policy memo on use of natural flavors in organic food: a flavor is permitted in organic food if from nonsynthetic sources, meets U.S. Food and Drug Administration definition at 21 CFR 101.22, and is not produced using synthetic solvents, carriers or preservatives.
- The FDA definition at 21 CFR 101.22(a)(3) applies only to flavors used in food.

The Use of Chlorine to Break Shell Eggs



Is a rinse required after use of chlorine to break shell eggs?

Answer – no; policy memo forthcoming.

- Egg products (i.e., eggs removed from their shells for processing at facilities called "breaker plants") are distinct from table eggs (eggs that are sold to consumer in the shell).
- 7 CFR 205.605(b): "Chlorine materials—disinfecting and sanitizing food contact surfaces, *Except*, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite)."
- NOP 5026 final guidance on use of chlorine materials clarifies that its use in organic handling, including eggs, must be followed by a rinse step.
- However, USDA Food Safety Inspection Service (FSIS) Egg Product regulations require the use of an approved sanitizer of not less than 100 ppm nor more than 200 ppm of available chlorine or its equivalent prior to the breaking of shell eggs (9 CFR 590.516(a)).



Who Needs to be Certified?

February 19, 2014

ACA Training – San Diego, CA

USDA Agricultural Marketing Service

National Organic Program



Today's Training Objectives



- Discuss the legal requirements for organic certification
- Examples of business arrangements that do or do not require operations to be certified

Background - Need for Clarification



- NOP audits and investigations found that certifiers were applying inconsistent criteria regarding who needs to be certified
- In some cases, the NOP has issued Notices of Noncompliance to certifiers
- There are many different business arrangements in agriculture, which can make certification complex

Need for clarification



NOP found:

- Uncertified processors “covered” under another operation’s certification
- Multiple operations on one certificate
- A revoked operation was allowed to process organic food under contract for a certified operation
- An operation listed on a certificate that was not inspected

Organic Foods Production Act



"...agricultural product to be sold or labeled as organically produced must be produced only on certified organic farms and handled only through organic certified handling operations...."
(emphasis added)

7 USC 6506(a)

USDA organic regulations



...each production or handling operation or specified portion of a production or handling operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must be certified....

7 CFR 205.100(a)

Who can be certified: Definitions



Person. An individual, partnership, corporation, association, cooperative, or other entity.

Certified operation. A crop or livestock production, wild-crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agent as utilizing a system of organic production or handling as described by the Act and the regulations in this part.

Inspection as an indicator



- Accredited certifiers only have the legal authority to inspect certified organic operations or operations seeking organic certification
- If you need to inspect an operation to verify compliance with the USDA organic regulations, that operation is required to be certified

What is allowed



A certified operation may:

- Lease land, facilities and equipment
- Purchase or contract for production or processing services conducted on its premises
- Hire an uncertified operation to transport its organic products

What is allowed (continued)



A certified operation may:

- Process organic products using leased facilities or equipment as long as the certified operation is managing the processing activities

What is prohibited



A certified operation may not allow an uncertified operation, under contract or other arrangement, to produce or process, on the uncertified operation's premises, products to be sold or labeled as organic

Examples



- Slaughter facility
- Olive press
- Fruit packing facility
- Grain storage
- Grain cleaning
- Renting community kitchen
- Leasing grain silo

Next steps



- NOP will assess compliance with this instruction during 2014 audits
- NOP will note a noncompliance if certifiers are not complying with the instruction
- Certifiers not in compliance will need to implement corrective action plans
- NOP will continue to investigate complaints about uncertified operations producing and handling organic products

Benefits and mitigating factors



- Consistency among certifiers means a level playing field for operations
- Certifying more organic operations may provide new opportunities for organic sales
- Resources and support
 - Certification cost share program
 - Technical assistance



Verifying the Legal Status of Operations Seeking Organic Certification

February 19, 2014

ACA Training – San Diego, CA

USDA Agricultural Marketing Service

National Organic Program



Today's Training Objectives



- Explain the need for this clarification
- Discuss different types of legal business entities
- Discuss resources for verifying legal status

Why verify the status of operations?



Necessary and important in carrying out certification responsibilities concerning:

- Confirm the identity of certification applicants (205.401(b) and 205.406(a)(2))
- Verification of compliance (204.402(c))

Why verify the status of operations (cont.)?



- Provision of information to the NOP and to the public (205.501(a)(15)(ii) and 205.504(b)(5))
- Adverse Actions – issuing notices and identifying responsibly connected persons

What is a Person?



Person. An individual, partnership, corporation, association, cooperative, or other entity.

7 CFR 205.2

Types of Business Entities



- Individual/sole proprietorship
- Partnership
- Corporation
- Association
- Cooperative
- Public entity, e.g. university research farm

Where to Verify Operation Status



- Many State websites have directories of licensed businesses (e.g. California, Delaware, Mississippi, Ohio, Washington)
- The Small Business Administration provides links to State licensing offices:

<http://www.sba.gov/licenses-and-permits>

Next Steps



- AMS auditors may inquire about legal status of your clients at your next audit
- Remember – Only one “person” per organic certificate



Questions?



	KONTROL RAPORU KISIM 1	1/8 XXXX-XXXX.XX
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Müşahhıs ismi			
Müşahhıs adresi			
Lisans No			
Yetkili			
Tel/faks/e posta/web	Tel: Fax:	Email:	Web:
Kontrol edilen üniteler	Arazi Ünitesi:	İşletme Ünitesi:	
Kontrol tarihi			
Kontrolör			

Kontrol	İlk Kontrol <input type="checkbox"/>	Devamlılık Kontrol <input type="checkbox"/>	Ara kontrol <input type="checkbox"/>	Resertifikasyon <input type="checkbox"/>	Habersiz <input type="checkbox"/>
Regulation	TC 27676 <input type="checkbox"/>	NOP <input type="checkbox"/> USA	COR <input type="checkbox"/> CANADA		
	Üçüncü Ülkeler için Avrupa Birliğı Eşdeğer Organik Üretim ve İşleme Standardı Equivalent European Union Organic Production & Processing Standard for Third Countries <input type="checkbox"/>				

Konu					
Müşahhıs imzası					
Özet					
Uygunşuzluk sayısı	Major	-	Minor	-	
Notlar:					
Takip kontrolü gereklimi?		EVET <input type="checkbox"/>	HAYIR <input type="checkbox"/>	Şayet gerekliyse tarih	
Takip denetimi için notlar					
Kontrolörün tavsiyesi					
Bütün uygunşuzluklar kapandı	EVET <input type="checkbox"/>	HAYIR <input type="checkbox"/>	Sertifikasyon verilebilir	EVET <input type="checkbox"/>	HAYIR <input type="checkbox"/>
İmza			Tarih		

	KONTROL RAPORU KISIM 2	2/8 XXXX-XXXX.XX
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Rapor no		Tarih	
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Müteşebbis ismi			
Müteşebbis Lisans No			
Yetkili			
Müteşebbis adresi			
Tel/faks/e posta/web			
Kontrol edilen üniteler			
Başlama Tarihi ve Saati	Bitiş Tarihi ve saati	Toplam Denetim Süresi	
Kontrolör ismi			
Önceki raporlar			

Bu rapor onay alınması için size gönderilmiştir. Şayet ETKO'ya bu raporun içeriği konusunda 7 gün içinde herhangi bir eleştiri gelmez ise, raporu onayladığınız varsayılacaktır. Bu raporda yer alan uygunsuzlukların giderilmesi sizin sorumluluğunuzdadır.

Sertifikada yer alan ürün ve işletmelerin sertifikalandırılması yapılan örneklemeler ve örneklerin laboratuvar analizlerinin temiz çıkmasına bağlıdır. Tahlil sonuçları size de gönderilecektir.

Sertifikalandırılan işletmeler; %100 organik, organik veya organik üründen yapılmıştır gibi etiketlerle satışa sunulan ürünlerin söz konusu yönetmeliklere uyumlu olarak yetiştirildiğini gösteren ve ispat eden yeterli dokümantasyona sahip olmalıdırlar. Sertifikalandırılan üretim alanları ve işletmelerle ilgili olarak hazırlanan dokümanlar müteşebbis tarafından sürekli olarak anlaşılabilir ve denetlenmeye açık bir durumda tutulmalı ve ayrıca bu dokümanlar müteşebbin söz konusu yönetmelik çerçevesinde hareket ettiğini gösterebilmelidir. Bu dokümanlar en az sertifikasyonu takip eden 5 yıl boyunca düzgün bir şekilde denetlemeye açık vaziyette tutulmalıdır. Müteşebbis bu dokümanları ETKO ve yetkili resmi mercileri temsil eden kişilere gereksinim duyulduğunda ve talep edildiğinde vermelidir. Bu dokümanlar resmi mesai saatleri arasında incelenebilir.

ETKO
160 sk No: 13/7
35040 Bornova – İzmir - TURKEY
Tel:+90-232-3397606, Fax:+90-232-3397607
E-mail:info@etko.org, www.etko.org

Baş kontrolör	Kaşe	Kontrolör

	KONTROL RAPORU KISIM 2	3/8 XXXX-XXXX.XX
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İçerik

- 1-Kontrol metodu ve özet
- 2-Giriş
- 2.1.Üretici ve işletmecilerin sorumlulukları
- 3-Genel sertifikadaki değişiklikler
 - 3.1.Zirai işletmeler
 - 3.2.Ürün işlem üniteleri
 - 3.3. Ürünler
 - 3.4. Detaylı hektarlar
 - 3.5. Pazarlama değerleri
- 4-Örnekleme
- 5-Bulgular
6. Tanımlanan uygunsuzluklar
- 7-Müştebbis tarafından alınan şikayetler ve önlemler
- 8-İşletme Bilgi Formu
- 9-Üretimle ilgili bilgiler
- 10-Logo ve Sertifika kullanımı
- 11-Uygulanan formlar

1- Kontrol metodu ve özet

ETKO ISO 65 / EU 45011 Kalite Standartlarında çalışan uluslararası bir kontrol ve sertifikasyon firmasıdır. ETKO Ekolojik Üretim Metotlarına bağlı olarak çalışır ve Gıda Tarım ve Hayvancılık Bakanlığı BUGEM İyi Tarım Uygulamaları Ve Organik Tarım Uygulamaları Dairesi ne bağlı olarak çalışır. (TR-OT-004)

Kontrol ve Sertifikasyon süreci ETKO Kalite Sistemi prosedür ve talimatlarına göre yürütülmekte olup Organik Tarım Yönetmelikleri çerçevesindedir. Kontroller sırasında ETKO kontrolörleri standart formlar kullanırlar ve kontrol bulgularını, uygunsuzlukları ve düzeltici faaliyetleri kaydederler.

En son kontrol raporuna ve kontrolörün önerisine bağlı olarak, sertifikasyon komitesi sertifika yayınlamaya veya aksine karar verir. Sertifikanın yayınlanabilmesi için açık hiç bir uygunsuzluk raporu kalmamış olmalı ve müteşbbisin ürünlerine ve prosesine ilişkin tüm gereklilikleri yerine getirdiği raporlarda belirlenmiş olmalıdır.

2. Giriş

(Bu bölümde müteşbbis hakkında genel bilgiler verilmelidir. Kontroller ne zaman başladı, projenin genel olarak gelişimi, organik ürünler ve müteşbbisin diğer çalışma alanları, genel olarak üretim sistemi, üreticilerin yaşam ve geçim tarzları, (aile yapısı, gelenekler, iletişim vs). Çevre koşulları, ürünün işlenmesi ve işletmeler vs) Ara kontrol periyodunu veya tarihlerini açıkça yazınız.

Tarihçe:

Araziler:

İşletmeler:

Kontrol:

Ayırım:

Kontrol Sonucu:

Proje kayıtları: (İDS veya üreticiler tarafından tutulan muhasebe kayıt bulgularını kayıt ediniz. Üretim kayıtlarının bireysel üreticiler veya proje yönetimi tarafından tutulması bir sertifikasyon süreci gerekliliğidir ve kontrol esnasında kayıtlar doğrulanmalıdır)

İç Denetim Sistem Değerlendirilmesi: (Buraya üretim arazilerinde gördüğünüz risklerin analiz bulgularını ve olası kontaminasyon faktörlerini kaydediniz. Olası risklerde prosedür gereği üreticiler tarafından alınan önlemleri kaydediniz. Herhangi bir tampon bölge mevcut mu, kontaminasyon tehlikesi altındaki hammaddenin ayrı olarak hasatlanması, vs..)

Ara kontroller: Ara kontrolün amacı yetiştiricilik periyodunda ortaya çıkabilecek hastalık, zararlı ve yabancı otlarla mücadele ve toprak besleme uygulamalarının denetlenmesi ve üretimden örneklemelerin yapılmasıdır. Ara kontrollerin sayısı ilk kontrolden sonra ilgili kontrolör tarafından belirlenir. Ara kontrol sayısının belirlenmesinde üretim deseni ve söz konusu ürünlere ait kritik dönemler önem taşır. ETKO ara kontrol yapmakta serbesttir.

Geçiş süreci kısaltmaları (Geçiş süreci ile ilgili kısaltma/uzatma gerçekleştirilmişse bunun nedenini açıklayınız):

2.1. Üretici ve işletmecilerin sorumlulukları

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Burada üretici ve müteşebbis arasında yapılan anlaşmalardan bahsedilecektir. Üreticilerin uymakla yükümlü oldukları kurallar yazılacaktır

2.2. Özel durumlar:

- İyon radyasyonuna tabi tutulmuş herhangi bir tarım girdisi kullanılmamıştır.
EVET ☐ HAYIR ☐ G/D ☐
- Genetik modifiye herhangi bir üretim materyali veya tarım girdisi kullanılmamıştır.
EVET ☐ HAYIR ☐ G/D ☐
- Üreticiler organik olarak sertifikalandırılmamış ancak kullanılmasına izin verilen materyallerle muamele edilmiş üretim materyallerini kullanmak zorundadırlar.
EVET ☐ HAYIR ☐ G/D ☐

Açıklama:

- Mevcut bulunan hastalık ve zararlılar nedeniyle üreticiler yönetmeliklerde kullanılmasına izin verilen materyalleri kullanmak zorundadırlar. Sorunlar tanımlanmış ve kullanılan maddeler zaman ve dozları da açıklanacak şekilde verilmiştir.
EVET ☐ HAYIR ☐ G/D ☐

Açıklama:

- Üreticiler yönetmeliklerce kullanımına izin verilen toprak gübreleme malzemeleri veya metodlarını kullanmak zorundadırlar. Kullanım nedenleri, hektara miktarı ve zamanı vs açıklanmıştır.
EVET ☐ HAYIR ☐ G/D ☐

Açıklama: Gübre uygulama metodları açık bir şekilde açıklanmalıdır: Gübre kompostlama işlemine tabi tutulmuş mudur. Yetiştirilen ürünün yenilebilir kısmı toprak yüzeyi ile direk temas halinde olsun veya olmasın bu gübrenin en son kullanım zamanının belirtilmiş olması gereklidir. Yetiştirilen ürünlerim yenilebilir kısmı direk ile temas halinde ise bu gübrenin en son 120 gün önce atılmış olması temas halinde değil ise en son 90 gün önce atılmış olması gereklidir.

- Diğer madde veya metotlar.

EVET ☐ HAYIR ☐ G/D ☐

Açıklama:

3. Genel sertifikadaki değişiklikler:

Aşağıdaki üniteleri genel sertifikaya ekleyiniz veya çıkarınız, (sertifikanın içeriğinde herhangi bir değişiklik varsa: yeni bir üretici, işletme, ürün veya proje dışına alınan üretici, ürün veya işletmeler)

3.0 Kontrol Gerekli Görülmeyen aktiviteler ve Üniteler

Ünite No	Ünite	Aktiviteler - Materyal	Gerekçe

3.1. Zirai işletmeler:

Ünite numarası	Ünite	Üretici sayısı, toplam alan ve ürünler	Statü

3.1.1 İptal edilen zirai işletmeler:

Ünite numarası	Ünite	Nedeni

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3.2. Ürün işleme üniteleri:

Ünite numarası	Ünite	Proses	Adres

3.2.1 İptal edilen ürün işleme üniteleri:

Ünite numarası	Ünite	Nedeni

3.1&3.2 Lütfen aşağıya sertifikasyona dahil olmayan arazi, işletme veya ekipman varsa eğer bunun ile ilgili bilgi yazınız

Ünite Nr.	Ünite	Sertifikasyona alınmama sebebi

3.3. Ürünler:

Ürün numarası	Ürün ismi	En Son Ürün	Beklenen veya gerçekleşen verim (ton)	Statü	İşletme no

3.4 Detaylı arazi ölçüleri ve beklenen verim miktarları:

Ünite no	İsim	Ürün	Hektar		Üretici sayısı	İlk Kontrol Yılı
			Organik	Geçiş		
	TOPLAM					
	ÖZET					
	Ürün	Toplam Hektar	Ton/ha	Toplam ton	Statü	

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3.5 Pazarlama Değerleri (Bir önceki sezonun pazarlama değerlerini yazınız)

Bir önceki yıl						
Ürün	Toplam hektar	Beklenen ürün t/ha	Toplam beklenen ürün	Üreticiden alınan miktar	Satış miktarı	Stok miktarı

3.5.1 Başka Projelerden Alınan Ürünler:

Proje numarası	Ürün ismi	En Son Ürün	Alınan Miktar	Statü	Sertifika Numarası	Stok Miktarı

4. Örneklem

(Eğer örnek alındıysa aşağıdaki tabloyu doldurunuz)

Üretici no	Ürün	*Miktar	Tarih	Mühür No		
				ETKO	Müteşebbis	Laboratuar

*Miktar: O anda örneklem yapılan ürünün miktarı verilmelidir. (O anda depoda ne kadar ürün var)

- Kontrol sırasında herhangi bir örnek alınmadıysa işaretleyiniz

☐

5. Bulgular (Burada projenin güçlü ve zayıf noktalarını açıklayınız)

- Projenin güçlü tarafları:

- Projenin zayıf tarafları:** Aşağıda dikkat edilmesi gereken konular verilmiş olup bunların sertifikasyon kararının alınmasında herhangi bir etkisi yoktur. Ancak gelecek kontroller için dikkate alınmalıdır.

Konu	
Ünite	
Standart	
Dikkat edilecek konu	

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6. Uygunsuzlukların Genel Durumu

Uyg. rap.no	Ünite	Konu	Tarih	Standard, yönetmelik	Durum

7. Müteşebbisin aldığı şikayetler ve aldığı tedbirler: Kontrolör müteşebbisin şikayetleri kayıt ettiğine dair belgeleri görmelidir. Şikayet durumunda alınan tedbir ISO 65 gerekliliğini karşılamalıdır. **Bu konu NOP Sertifikasyonu için geçerli değildir.**

Alınan şikayet	Alınan tedbir

8. Bu kısımda PROSES BİLGİ FORMU' nu referans vererek buraya ilave ediniz. (OP 01 F 10)

9. Üretim ile ilgili bilgiler: Üretim ile ilgili bilgiler formunu (OP 01 F 09) referans vererek buraya ilave ediniz.

10. Logo ve sertifika kullanımı (ETKO logo ve sertifikasının uygun kullanılıp kullanılmadığının kontrolü)

11. Bu raporun ekine giren ilgili diğer kayıtları lütfen işaretleyiniz:

GP 13 F 02–03	Master Sertifika-Müteşebbis Sertifikası	
GP 14 F 01	Uygunsuzluk Raporu	
OP 01 F 04	Üretim Deseni	
OP 01 F 05	Çiftlik Kontrol Formu	
OP 01 F 06	Arıcılık üretim ve işleme kontrol formu	
OP 01 F 07	İşletme Kontrol Formu	
OP 01 F 08	Tekstil İşletme Kontrol Formu	
OP 01 F 09	Üretim İle İlgili Bilgiler	
OP 01 F 10	Proses Bilgi Formu	
OP 01 F 11	Tekstil Proses Bilgi Formu	
OP 01 F 12	Arazi Tarihçesi ve Ekolojik Tarıma Dönüşüm Formu	
OP 01 F 13	Ürün Spesifikasyonu	
OP 01 F 14	Ürün Spesifikasyonu Değerlendirmesi	
OP 01 F 15	Etiket Bilgileri Değerlendirilmesi	
OP 02 F 01	ICS Değerlendirilmesi	

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OP 02 F 02	ICS Spesifikasyonu	
OP 03 F 01	Örnekleme Formu	
	Üretici listesi	

12. Görüşülen personel

Adı soyadı	görevi

13. Görülen dokümanlar ve kayıtlar

Birim /ünite	Documents / records



RAPOR HAZIRLANMASI

Raporlarda Küçük Detaylar

- ❑ Öncelikle raporumuzun son hali yani rev 07de olmasına dikkat etmeliyiz.

All NCRs are closed	YES	NO	Proceed/continue to certification	YES	NO
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Signed				Date	

Açıklama:

3. Genel sertifikadaki değişiklikler:

Aşağıdaki üniteleri genel sertifikaya ekleyiniz veya çıkarınız, (sertifikanın içeriğinde herhangi bir değişiklik varsa: yeni bir üretici, işletme, ürün veya proje dışına alınan üretici, ürün veya işletmeler)

OP.01.F.03 Rev.7

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3.1. Ziraî işletmeler:

Unite numarası	Unite	Üretici sayısı, toplam alan ve ürünler	Statü
2086F-01	Akın TURE	1 Üretici, 4.56 da, Meyve ve Sebze, tıbbi aromatik bitkiler	Organik
2086F-01	Akın TURE	1 Üretici, 4.64 da, Meyve	Organik

3.0 yazılması

3. Genel sertifikadaki değişiklikler:

Aşağıdaki üniteleri genel sertifikaya ekleyiniz veya çıkarınız, (sertifikanın içeriğinde herhangi bir değişiklik varsa: yeni bir üretici, işletme, ürün veya proje dışına alınan üretici, ürün veya işletmeler)

3.0 Kontrol Gerekli Görülmeven aktiviteler ve Üniteler

Unite No	Unite	Aktiviteler - Materyal	Gerekçe

EVE I ☒

HAYIR ☐

G/D ☐

Açıklama:

3.0 Kontrol Gerekli Görülmeven aktiviteler ve Üniteler

Unite No	Unite	Aktiviteler - Materyal	Gerekçe
3128D-01	Eko Turka	İşleme, paketleme, pazarlama, Depolama, dokümantasyon.	16.02.2013 tarihinde uğur özbilir tarafından denetlenmiştir.bakınız control raporu 2542-2013.uo

3.1 Zirai İşletmeler

KONTROL ORGANİZASYONU

TARIM

3.1.Agricultural units:

Unit nr	Unit	Producers and farmers	Status
P 01	Wild collection	29 collectors, estimate 500 t	org


3.1. Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Unit nr	Status
3013F-21	TOV "Agrohim" - Lugansk	(b) (4) ha arable fields, 1 producer		Org
3013F-22	FH "Olexandrovo"- Lugansk	ha arable fields, 1 producer		Org
3013F-23	FH "Garant"- Lugansk	ha arable fields, 1 producer		Org
3013F-24	FH "Don"- Lugansk	ha arable fields, 1 producer		Org
3013F-25	OOO "Belolutsk Agro"- Lugansk	ha arable fields, 1 producer		Org
3013F-26	TOV Agrofirma "Kalmychanka"	ha arable fields, 1 producer		Org
3013F-27	FH "Vdovenko"- Lugansk	ha arable fields, 1 producer		Org
3013F-28	STOV AF "Zakotnenskaya"	ha arable fields, 1 producer		Org
3013F-29	TOV "Ros Agro" - Kirovograd	ha arable fields, 1 producer		Org

3.2 Yazılması

3.2. Processing units

Unit nr	Unit	Process	Address
D 04		Processing	Lipova 26,V.Banja
D 05			Sr.Gracac bb,Podunavci
D 06			Veluce bb ,Stopanja



3.2. Processing units

Unit no	Unit name	Process	Address
3090D-01	Everi Ltd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	14, Gmyreva str. , Nikolaev , Ukraine
3090D-02	SC Agrocontract Ltd.	Storage and transshipment	89, Kosmonavtov str. , Nikolaev , Ukraine
3090D-03	NikaTransGroup Ltd.	Storage and transshipment	1-A Morekhodnaya str. , Nikolaev , 54003 Ukraine
3090D-04	SG S Ukraine	Inspection	40/42, Atamana Golovatogo str. , Odessa , Ukraine
3090D-05	Intertek Ukraine	Inspection	115, Chermonorskogo Kazachestva str. , Odessa , Ukraine
3090D-06	Snita Ltd.	Process seed, oil and cake production	4, Promyshlennaya str. , Bashtanka , 56100, Ukraine
3090D-07	Orexim Limited	Financing, foreign trader	71, Brunswick str. , Edinburgh , EH75HS, United Kingdom
3090D-08	Yugekotop Ltd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	4/4, Lyagina str. , office 301, Nikolaev , 54001 Ukraine (old - Ukraine, 54055, Nikolaev , Sevastopolskaya str. , 66-B)
3090D-09	Novomyrgorodskiy Sugar Factory	Process sugar, sugar beet pulp cake/expeller, sugar beet pulp molasses	v. Kapitonivka , Novomyrgorodskiy area , Kirovograd region , Ukraine
3090D-10	Fozzy-Food	Import-export, trading, finance, forwarding	5, Promyshlennaya str. , t. Vyshnevoe , Kiev region , 08132, Ukraine
3090D-11	Weltop	Import-export, trading, finance, forwarding	39/41, Shota Rustaveli str. , Kiev , 01019, Ukraine
3090D-12	PP ATK-Dnipro	Seeds processing, oil and cake production	34 Trolleybusnaya str. , Zaporozhye , 69008 Ukraine

3.3 Yazımı

3.3. Products

Product nr	Product	Final product	Expected or realized harvest (ton)	Status	Processing unit
P01	Wild apple	Fresh apple	(b) (4)	O	D04
P02		Pasteurized wild apple juice		O	D04
P03		Wild apple cider		O	D04
P04		Wild apple pulp		O	D06

3.3. Ürünler:

Ürün numarası	Ürün ismi	Ürün türü	Ürün miktarı (ton)	Statü	İşletme no
2203P - 01	Çilek	Taze	(b) (4)	Organik	2203D - 01
	Çilek	Taze		Geçiş 3	
	Çilek	Taze		Geçiş 2	
	Çilek	Taze		Geçiş 1	
2203P - 02	Vişne	Taze		Organik	
	Vişne	Taze		Geçiş 3	
	Vişne	Taze		Geçiş 2	
	Vişne	Taze		Geçiş 1	
2203P - 03	Kiraz	Taze		Organik	
	Kiraz	Taze		Geçiş 2	
	Kiraz	Taze		Geçiş 1	
2203P - 04	Elma	Taze		Organik	
	Elma	Taze		Geçiş 2	
	Elma	Taze		Geçiş 1	

3.3. Products

Product nr	Product	Final product	Expected or realized harvest (ton)	Status	Processing unit
2542P-01	Barley	Grain	*	Organic	2542D-01,02
2542P-02	Beans	Bean		Organic	2542D-01,02
2542P-03	Rapeseeds	Grain		Organic	2542D-01,02
2542P-04	Chickpea	Pea		Organic	2542D-01,02
2542P-05	Corn	Grain		Organic	2542D-01,02
2542P-06	Cotton	Baled		Organic	2542D-01,02
2542P-07	Hazelnuts	Kernel		Organic	2542D-01,02
2542P-08	kidney bean	Bean		Organic	2542D-01,02
2542P-09	Lentils Green	Grain		Organic	2542D-01,02
2542P-10	Lentils red	Grain		Organic	2542D-01,02
2542P-11	Lentils Yellow	Grain		Organic	2542D-01,02
2542P-12	Linseed	Grain		Organic	2542D-01,02
2542P-13	Millet	Grain		Organic	2542D-01,02
2542P-14	Mung beans	Bean		Organic	2542D-01,02
2542P-15	Mustard	Grain		Organic	2542D-01,02
2542P-16	Oat	Grain		Organic	2542D-01,02
2542P-17	Peas	Pea		Organic	2542D-01,02
2542P-18	Pistachios	Kernel		Organic	2542D-01,02
2542P-19	Rice	Grain		Organic	2542D-01,02
2542P-20	Rye	Grain		Organic	2542D-01,02
2542P-21	Safflower	Grain		Organic	2542D-01,02
2542P-22	Sesame	Grain		Organic	2542D-01,02
2542P-23	Sorghum	Grain		Organic	2542D-01,02
2542P-24	Soybean	Bean		Organic	2542D-01,02
2542P-25	Sunflower seeds	Kernel		Organic	2542D-01,02
2542P-26	Vetch seeds	Grain		Organic	2542D-01,02
2542P-27	Wheat	Grain		Organic	2542D-01,02

*Quantities depend on the suppliers. Ekoturka will source certified organic products listed from certified sources.

3.4 Yazımı

3.4 Detaylı arazi ölçüleri ve beklenen verim miktarları:

Unite no	İsim	Ürün	Hektar		Üretici sayısı	İlk Kontrol Yılı
			Organik	Geçiş		
2044F-01	Arif Gürdal Çiftliği	Mısır Dane	(b) (4)	---	1	2005
		Yonca		---		
	TOPLAM					
	OZET					
	Ürün			Toplam	Statü	
	Mısır Dane	(b) (4)		ton	Organik	
	Yonca				Organik	

3.4 Detaylı arazi ölçüleri ve beklenen verim miktarları:

Ünite no	İsim	Ürün	Hektar		Üretici sayısı	İlk Kontrol Yılı
			Organik	Geçiş		
2565F-01	Akseçkin	Elma		20.9221	5	2013
2565F-01	Akseçkin	Kayısı		1.2182	1	2013
2565F-01	Akseçkin	Nadas		16.0879	1	2013
	TOPLAM					
	ÖZET					
	Ürün	Toplam Hektar	Ton/ha	Toplam ton	Statü	
	Elma	(b) (4)				
	Kayısı					
	Nadas					

3.5 Yazımı

3.5 Pazarlama Değerleri (Bir önceki sezonun pazarlama değerlerini yazınız)

Bir önceki yıl						
Ürün	Toplam hektar	Beklenen ürün t/ha	Toplam beklenen ürün	Üreticiden alınan miktar	Satış miktarı	Stok miktarı
Mandalin	(b) (4)					-
Valensiya portakal						-
Washington portakal						-
Greyfurt						-
Limon						-
Nar						-
İncir						-
Avokado						-
Domates						-
Salatalık						-
Patlıcan						-
Kabak						-
Fasulye						-
Patates						-

3.5 Marketing results: (Please explain the previous year marketing results) [Prodexim Ltd 3076](#)

Crop	Previous year 2012 season					
	Total Hectare	Expected yield t/ha	Total ton estimation	Bought from the farms	Sold amount	Stock amount
Alfa-alfa	(b) (4)					
Barley						
Carrots						
Cerry						
Chickpea						
Corn						
Flax						
Grape						
Millet						
Mustard						
Onion						
Peach						
Peas						
Pumpkin						
Rapeseeds						
Strawberry						
Sunflower						
Walnut						
Wheat						
Total						

*Stock in farms. Organic product was not sold – keep in stock farms.



Teşekkürler...

TRAINING PROGRAM 2014

August 15, 2014 Friday:

Morning: Opening meeting: Discussion of the developments and activities from 2013 season and future plan for 2014.

Follow up visit to Globalseed company for livestock for complaint received from IOAS-Ceres-Albert Benzigh.:

See questions and answers IOAS

Friday afternoon: Internal Audit

16.08.2014 Saturday: Internal auditing checking the client files. 2013 Financial reports. Personnel files, Inspection plans, Realized inspections

17.08.2014 Sunday: ETKO QMS System check. And Management Review

18.08.2014 Monday Morning: Personnel training for EC-NOP-COR-Serbian. Non conformity procedures. Investigation irregularities, Sampling and Traceability.

Planning for Mirabelle inspection. During the Mirabelle inspection in May Milenko issued an NC related to traceability.

Due to rainy and fresh weather during the growing season, diseases are big problem, organic products might be contaminated from the neighbors or they apply in case of the severe problem..

18.08.2014 Monday afternoon: Mirabelle inspection for harvest 2014.

19.08.2014 Tuesday: Morning Personnel training
Afternoon ECMELE inspection for witness audit. Producers.

20.08.2014 Wednesday: Personnel training

17.00 H depart to Romania

August 15, 2014 Friday: Morning: Opening meeting: Discussion of the developments and activities from 2013 season and future plan for 2014.

Follow up visit to Globalseed company for livestock for complaint received from IOAS-Ceres-Albert Benzigh.:

Participants: Mustafa Akyuz (Man. Dir-ETKO), Milenko Kosutic (ETKO Inspector), Goran Pivnicki (Advisory Committee). Globalseed technical team:

The purpose of the visit was the complaint received from IOAS related to the certification system for livestock acc IACB Standards. An EU based certifier "CERES-DE" made the complaint about the ETKO inspection was not good enough to see following matters related to Animal welfare, hormone use and feed ratios. 3 person representing ETKO Turkey and Serbia went to Globalseed to verify the correctness of the complaint and the points indicated by CERES which were in doubt complying the IACB and EC Regulations requirements.

Head of the management and technical persons were present during the follow up visit, veterinaries, agronomist, and marketing manager and help to do the re-evaluation of the complaint matters.

During the audit we checked thoroughly once again all questions and found below answers according to corresponding clauses of the IACB and EC Regulations.

See questions and answers IOAS

Question IOAS	Regulation Clause	Explanation	CERES NC	Justification
1. That the feed ration for the dairy cows contains conventional brewers grains (IACB 6.7.16.4);	4. Non-organic feed materials from plant origin, feed materials from animal and mineral origin, feed additives, certain products used in animal nutrition, and processing aids shall be used only if they have been authorized for use in organic production under Annex XI; IACB Annex V and EC 889 Annex V includes brewers' grains as allowed material to use.	Annex 6 indicates the feed ratios and indicated 0.95 - 1 % brewer's grain is used. See Annex 6 indicating the list of used feed material	Ceres Auditor issued an NC indicating starting 2012 it is not allowed to use Brewers grains. See NC 1 in the list of CERES.	Acc to IACB and 889 Annex V Brewers grain is allowed to be used therefore ETKO allowed the producer to use brewer's grains as feed material.
2. That the feed ration was predominantly based upon concentrates rather than pasture and forage (< 60%) (IACB 6.7.18);	IACB 6.7.18 and 889/Art 20 mentioning: 2. Rearing systems for herbivores are to be based on maximum use of grazing pasturage according to the availability of pastures in the different periods	ETKO evaluated the feed ratio and found appropriate acc to IACB 6.7.18 and EC Reg. See Annex 6 Feed Materials and Ratio List. In 2012; Concentrated feed ratio was 37% Dry Matter, the rest 63%	Ceres inspector mentioned in his NC as feeding material is based on more alfalfa and corn silage, and energy comes from the concentrated feed. Rearing system must be based on max use of	During 2012 and 2013 periods ETKO found the use of concentrates appropriate as in 2012 it was 37 percent and in 2013 28 5 percent. Maybe the question is related to 2014 period which is not under

	of the year. At least 60 % of the dry matter in daily rations of herbivores shall consist of roughage, fresh or dried fodder, or silage. A reduction to 50 % for animals in dairy production for a maximum period of three months in early lactation is allowed	was from hay, haylage, silage, milk and flakes. In 2013; Concentrated feed ratio was 28.5% and the rest 71,5% was silage, hay, haylage, straw, milk and leftover food. In Novi Sad region 6 months there is no possible to have pasture land due to winter conditions and it is not possible to keep animal out grazing at least for 6 months. But livestock has access freely to the open area within the farm all year.	pastures is questionable. See Ceres NC list 2	ETKO responsibility.
3. That in some cases cows were being heat induced with hormones (IACB 6.7.15.2);	IACB 6.7.15.2. Reproduction shall not be induced by treatment with hormones or similar substances, unless as a form of veterinary therapeutic treatment in case of an individual animal ; 834 Article 14 (ii) reproduction shall not be induced by treatment with hormones or similar substances, unless as a form of veterinary therapeutic treatment in case of an individual animal ;	Hormone was applied to delay the ovulation because there was a cyst developing on the ovary blocking ovulation and they had to solve the problem by applying hormones. Cyst blocked the ovary to produce new follicle for ovulation and hormone help the cows to eliminate the cyst and cow could produce. Hormones were not used for growth and production reasons. For this purpose only the hormone GnRH: Gonado Releasing was used. In 2013 there were 130 cows treated for the same reason. 13.6% entire year. In 2014 first 6 months 108 cows needed to be treated.	Some cases were found where reproductive hormones were used for cows with fertility problems. This is not allowed.	Regulations clearly indicate the purpose of the use and producer used the hormone only for therapeutic treatment. Therefore ETKO found practices in compliance acc to IACB 6.7.15.2.
4. That the housing conditions of the fattening bulls did not comply with Annex III of (EC) 889 and general welfare requirements and therefore the IACB standard (IACB 6.7.12.3)	3. The stocking density in buildings shall provide for the comfort, the wellbeing and the species-specific needs of the animals which, in particular, shall depend on the species, the breed and the age of the animals. It shall also take account of the behavioral needs of the animals, which depend in particular on the size	Global Seeds was waiting to sell fattening bulls and waiting for marketing. Ceres auditor saw the situation during the inspection and issued 4 th NC. Nothing to do with ETKO inspection period in 2013. In 2013 the housing conditions were normal acc to IACB 6.7.12.3. Producer explain that there were inundation problems in	What is true for the cows is not fully implemented for the fattening bulls. Their housing conditions were not as good as for the cows, some bulls seemed to have pneumonia problems and mortality rate from Jan 2014 to date was around 10%. This seems to indicate that health prevention for the bulls is deficient.	During ETKO audit in 2013 per head animal outdoor area was complying the requirements. Totally there were 2820 animal and 103182 m2 indoor, 218510 m2 outdoor area. So ETKO approved the housing conditions related to the outcome of the inspections done in 2012 and 2013. There were no sections where

	of the group and the animals' sex. The density shall ensure the animals' welfare by providing them with sufficient space to stand naturally, lie down easily, turn round, groom themselves, assume all natural postures and make all natural movements such as stretching and wing flapping	those days therefore marketing & transporting of the livestock was difficult for some days only.		stocking density violating the requirements. Globalseed declared 101 m2 outside and 7.85 inside area is present by the OCP-Organic Compliance Plan – Livestock.
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16.08.2014 Saturday: Internal auditing checking the client files. 2013 Financial reports. Personnel files, Inspection plans, Realized inspections

See Internal Audit Report 2014

17.08.2014 Sunday: ETKO QMS System check. And Management Review
See Management Review 2014

18.00 H Depart from Novi Sad to Blace.

18.08.2014 Monday Morning: Personnel training for EC-NOP-COR-Serbian Regulations. Non conformity procedures. Investigation irregularities, Sampling and Traceability.

Planning for Mirabelle inspection.

Due to rainy and fresh weather during the growing season, diseases are big problem, organic products might be contaminated from the neighbors or they apply in case of the severe problem..

18.08.2014 Monday afternoon: Mirabelle inspection for harvest 2014. Stock book checked, marketing results were taken. Sampling was done from the products in stock, raspberry, strawberry, sour cherry from the harvest 2014. After finishing the processing and marketing in Mirabelle, producers were inspected to check the corresponding marketing results and pest-disease management practices. Milenko Kosutic was the inspector. 3156D-02, Mirabelle and the producers: 3156F-01-41 Savic Darinko, 45 Jovanovic Mladin, 49 Vucic Borisav, 42 Todosijevic Milorad, 46 Jovanovic Milovan

19.08.2014 Tuesday: Personnel training on the sampling procedure, reporting, non-conformities issuing and evaluation NCs, follow up non-conformities and resolutions from the clients. Communication with the head office in Turkey.

Inspection of ECOMLE producers. 158 Slovoljub Simic, 176 Durica Milovanovic, 155 Ilija Panic, 153 Miki Recevic, 62 Jovan Andjelic

20.08.2014 Wednesday: Personnel training on EC, NOP, COR, RS regulations, questions and answers. Training on Investigation of Irregularities and Exchange of Information. Three cases were evaluated Rodina, TKK-Invest and SADEKO projects and experience with the residues and actions taken by ETKO.

17.00 H depart to Romania

**Code 01. ETKO Organic Agriculture Training
Participation List**
**Kod 01. ETKO Organik Tarım Eğitimi
Katılım Listesi(NOP-ISO 65)**

No	Name İsim	Occupation İşi	Company Name Şirket İsmi	Adres Company Şirket Adresi	Tel-Fax-Email	Signature İmza
1	Fatih AKSOY	Sertifika	ETKO	160. sk. 13/3 Barnalı-İZMİR	022 3397606 fa@etko.org	
2	H. SEVİN ÖZER	Kontrolör	ETKO	"	0537-3936892 hoo@etko.org	
	(b) (6), (b) (7)(C)	Kontrolör	ETKO	"	05007603386 dg. @ etko.org	(b) (6), (b) (7)(C)
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	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	bg@etko.org	(b) (6), (b) (7)(C)
	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	ys@etko.org	(b) (6), (b) (7)(C)
9	Yasin SERİN		ETKO	"	ys@etko.org	
10	Uğurcan K. KÖSEM		"	"	uk@etko.org	
	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	bg@etko.org	(b) (6), (b) (7)(C)
12						

Eğitim Konusu:

TC ve EU Yönetmeliklerindeki son değişiklikler
GOTS'ta Gırcılarla, NOP 2610 Örnekleme Talimatı, Kontrol Raporunda Gözlenen Eksiklikler.

Lecturer / Kurs Hocası:

Burak GÜRBÜZ
Fatih AKSOY
Mehmet N. KÖSEM

ETKO – Eğitim Yeri:

ETKO - İZMİR

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

**Code 01. ETKO Organic Agriculture Training
Participation List**
**Kod 01. ETKO Organik Tarım Eğitimi
Katılım Listesi(NOP-ISO 65)**

No	Name İsim	Occupation İşi	Company Name Şirket İsmi	Adres Company Şirket Adresi	Tel-Fax-Email	Signature İmza
1	Fatih AKSOY	Sertifika	ETKO	160.şh. 13/3 Barnan-izmir	022 3397606 fa@etko.org	
2	Huseyin ÖZER	Kontrolör	ETKO	"	0537-3936892 hoo@etko.org	
	(b) (6), (b) (7)(C)	Kontrolör	ETKO	"	05007603386 dg. @ etko.org	(b) (6), (b) (7)(C)
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	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	bg@etko.org	
	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	ys@etko.org	
9	Yasin SERİN		ETKO	"	ys@etko.org	
10	Uğurcan KOCALIK		"	"	uk@etko.org	
	(b) (6), (b) (7)(C)	Stajyer kontrolör	"	"	bg@etko.org	(b) (6), (b) (7)(C)
12						

Eğitim Konusu:

TC ve EU Yönetmeliklerindeki son değişiklikler
GOTS'ta Gırcılarla, NOP 2610 Örnekleme Talimatı, Kontrol Raporunda Gözlenen Eksiklikler.

Lecturer / Kurs Hocası:

Burak GÜRBÜZ

ETKO - Eğitim Yeri:

ETKO - izmir

GP 22 F 01Rev01

Fatih AKSOY
Mehmet N. KOSER

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

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2017	Signature
Name	İbrahim DUMAN	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?:

Kaite Newke

If you are an ETKO employee, what is your job title and to whom do you report?:

Managing Director

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name	<i>İbrahim DUMAN</i>	

(Please return the completed form)

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, polişeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemleri alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriye başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza	
İsim	Levent Kahraman		

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
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İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti vermesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)?

Sözleşmeli Personel

Komite Üyesi

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? Genel Müdür

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET HAYIR X

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: YOK

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET HAYIR X EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): YOK 1600 Euro

Kuruluşun ismi: LARER

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih: 2014

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	<i>Levent Kahraman</i>	<i>[Signature]</i>

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2017	Signature	
Name	ERDOĞAN SONAR		

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
	TARİH	01.05.2014
	REV. NO	05
	SAYFA	2/2

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: *Comitte member*

If you are an ETKO employee, what is your job title and to whom do you report?: *Not employed*

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name		
<i>ERDOĞAN SONAR</i>		<i>[Signature]</i>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

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- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
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Date	02.01.2017	Signature
Name	H. İsmet Güneş	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *Comittee member*

If you are an ETKO employee, what is your job title and to whom do you report? *Not employed*

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name	<i>Hüseyin Yılmaz</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2


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Date	02.01.2017	Signature
Name	Orhan Sovukcu	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

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If you are an ETKO employee, what is your job title and to whom do you report? *Not Employed*

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Yes ☒ No ☐ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: *Toratel*

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: *1300 Euro*

The date this relationship was established: *2008*

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name	<i>Orhan Savutsu</i>	<i>[Signature]</i>

(Please return the completed form)

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2


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- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	TOLGA USKUG	

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGI ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:


Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdüre bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	TOLGA USKUR	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemleri alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza	
İsim	Hakan KARABACAK		

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR X

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR X EVET ise, her bir ilişki için lütfen detay bilgi veriniz.

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

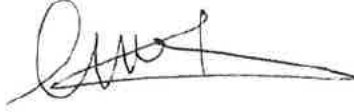
ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve

ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Hakan KARABACAK	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	04
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlanmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim		

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? *Committee member*

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? .

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☒ HAYIR ☐

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz:

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☒ HAYIR ☐ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri):

Kuruluşun ismi: *CEYLAN ARIKILIK*

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	<i>Hüseyin ÇETİNER</i>	<i>[Signature]</i>

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
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2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
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- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
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Date	02.01.2017	Signature
Name	Spa Youngde	Spam

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: *Inspector*

If you are an ETKO employee, what is your job title and to whom do you report?: *Inspector to Managing director*

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name	<i>Bo Gungde e</i>	<i>Spinn</i>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2


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Date	02.01.2017	Signature
Name	Artem Chernysh	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

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I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name:	Artem Chernysh	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
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Date	02.01.2017	Signature
Name	Mr. Asher Bilal	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

(This section is also valid for the certification committee members)

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The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

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I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name: Mr. Asher Bilal		

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP08F01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

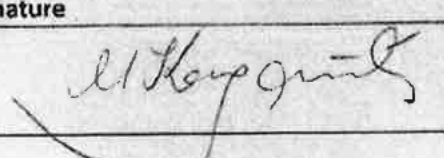
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Date	02.01.2017	Signature
Signature	MILENKO KOŠUTIC	

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08/F 01
	TARİH	01.05.2014
	REV. NO	05
	SAYFA	2/2

(This section is also valid for the certification committee members)

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The name of the entity:

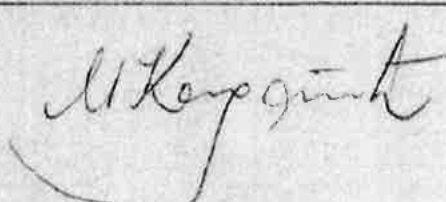
The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

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I guarantee do not dealing with marketing of ETKO certified products

Date	02.01.2017	Signature
Name: MILENKO KOŠUTIĆ		

Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
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Date	02.01.2017	Signature
Name	KAMAL AHMED	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

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Date	02.01.2017	Signature
Name	KAMAL AHMED	<i>Kamal Ahmed</i>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
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Date	02.01.2017	Signature
Name	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
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If you are an ETKO employee, what is your job title and to whom do you report?: **Inspector to Managing director**

Is a member of your immediate family employed by ETKO certified operator? Yes ___ **No X** ___ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest? Yes ___ **No X** ___ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): **NONE**

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.
I **guarantee do not dealing with marketing of ETKO certified products**

Date	02.01.2017	Signature
Name: (b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)

(Please return the completed form)

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakta yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim		

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
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İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

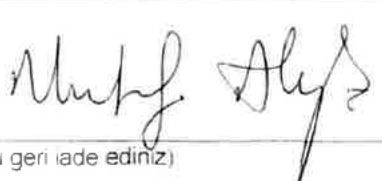
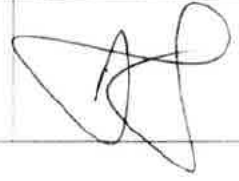
Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim		

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

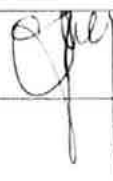
Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	ELENA MIRELA ALBUZ	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

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Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	ELENA MIRELA AICU Z	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
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2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
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Tarih	02.01.2017	İmza
İsim	F. Arslan Özden	

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	F. Arslan ERDEM	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3 cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriye başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Ceren Bayazıt	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ **HAYIR** ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ **HAYIR** ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Ceren Bayraktar	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakta yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim		

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR X

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR X EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	<i>Harit Çakır</i>	<i>Harit</i>

(Lütfen formu geri lade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2


Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sahifeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Faruk AKSOY	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET HAYIR X

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET HAYIR X EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:


ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve

ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Fatih AKSOY	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbirini ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakta yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriye başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	ERDEM ARUÇ	

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:



Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim		

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2017	Signature
Name	MEHMET YÜCE EKİNCİ	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	05
		SAYFA	2/2

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? **Taşeron**

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information. I **guarantee do not dealing with marketing of ETKO certified products**

Date	02.01.2017	Signature
Name	MEMET YÜCE EXİNCİ	

(Please return the completed form)

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	04
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Hüseyin Özer	

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? *Personel*

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? *personel*

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz:

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri):

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	<i>Hüseyin Özer</i>	<i>[Signature]</i>

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	2- Emin Taşerçek	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET HAYIR X

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET HAYIR X EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:


Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	2 ESİN YASAR TÜRK	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	<i>İbrahim Ocak</i>	<i>[Signature]</i>

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR **_X_**

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR **_X_** EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

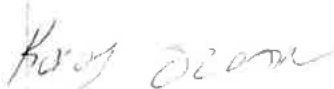

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim		

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon karar vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:


Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Ekrem GÜLER	

(Lütfen formu geri iade ediniz)

Hazırlayan: XYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim deseni tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriye başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Ekrem GÜLER	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EURO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğe bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Muhammet Lutfi Kaya	Ali

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLĞİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		REV. NO	05
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLĞİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Mücahit Uzun	Uzun

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ **HAYIR** ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ **HAYIR** ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürlüğüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	<i>Alişur Simdi</i>	<i>[Signature]</i>

(Lütfen formu geri iade ediniz)

Hazırlayan: XYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2


Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm ven, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgi çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgi çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Uğur SİMA	

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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İLGI ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR **X**

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR **X** EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:


Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdüre bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Ayşegül Esbin	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	1/2

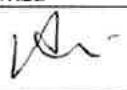
Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriyi başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim	Ayşegül Esbın	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:


Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	Emre GIKAK	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGI ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	1/2


Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGI ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
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Tarih	02.01.2017	İmza
İsim	Emre GİRAN	

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ **HAYIR** ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ **HAYIR** ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

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Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve

ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim		

(Lütfen formu geri lade ediniz)

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	1/2


Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sahifeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
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- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
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Tarih	02.01.2017	İmza
İsim	Ozanur Kılıç	

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
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		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)? **Sözleşmeli Personel**

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz? **Genel Müdür**

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ☐ HAYIR ☒

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz: **YOK**

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ☐ HAYIR ☒ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri): **YOK**

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim.

Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	02.01.2017	İmza
İsim	M. R. V. / G. Sem	

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	1/2

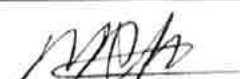
Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sahifeler, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemli alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO' nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon için belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO' ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
- 2.4. İlgili çelişkisine neden olduğu anlaşılan, sertifikasyon prosesinin her aşamasında ve sertifikalı ürünlerin veya tüm bağımsız birimlerin işlemlerinin izlenmesinde ticari olarak ilgili duruma gelen veya 24 aylık süre içinde sertifikasyon başvurularında danışmanlık hizmeti sağladığı anlaşılan hangi personel olursa olsun işten çıkarılacaktır.
- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
- 2.6. Sertifikasyon sürecindeki müşterinin değerlendirmesinde yer alan ve geçmiş 24 aylık dilimde müşteri ile ilgili çelişkisi olduğu anlaşılan ETKO personeli bulunur ise, müşterinin başvurusu tekrar değerlendirilir ve oluşacak ek masraflar müşteri tarafından ödenmekle yükümlüdür veya ETKO müşteriye başka kontrol kuruluşuna yönlendirme hakkına sahiptir.

Tarih	02.01.2017	İmza
İsim		

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	18.04.2016
		REV. NO	05
		SAYFA	2/2

İLGİ ÇELİŞKİSİ AÇIKLAMA FORMU

(Bu kısım sertifikasyon komitesi üyeleri içinde geçerlidir)

Adı geçen yıl ile ilgili olarak ne tür faaliyetlerde bulunduğunuzu burada belirtiniz. (ETKO ile çalışan firmalara danışmanlık hizmeti verilmesi veya ETKO adına sertifikasyon kararı vermenize engel teşkil edecek herhangi bir iş yapılması, vs.)

Lütfen aşağıdaki soruları cevaplayınız:

ETKO 'da ki pozisyonunuz nedir? (Örn: sözleşmeli personel, taşeron)?

ETKO'nun sözleşmeli personeli iseniz, görev unvanınız nedir ve kime sorumlusunuz?

ETKO tarafından sertifikalandırılmış müşteri ile sözleşmeli olarak çalışan yakın akrabanız var mı?

EVET ___ HAYIR ___

EVET ise, ismini, yakınlık derecesini ve unvanını (görev yaptığı yeri) belirtiniz:

Sizin veya aile üyelerinizden herhangi birinin ETKO tarafından sertifikalandırılmış müşteri ile doğrudan veya dolaylı yoldan ticari ilişkisi bulunuyor mu?

EVET ___ HAYIR ___ EVET ise, her bir ilişki için lütfen detay bilgi veriniz:

Müşteri ile ticari ilişkisi olan kişi (siz ya da aile üyelerinizden biri):

Kuruluşun ismi:

Kuruluşun ETKO ile olan ticari ilişkisi ve bu ilişkinin EUREO/DOLLAR üzerinden değeri:

Ticari ilişkinin kurulduğu tarih:

ETKO adına ticari ilişkiyi onaylayan ve gözlemleyen şahıs? :

Sizin veya aile üyelerinizden herhangi birinin kuruluş ile olan ilişkinin doğası hakkında (örn: hissedar, üye vs.) ve bu ticari ilişkinin tahmini parasal değerini bildiriniz:

ETKO'nun gizlilik ve ilgi çelişkisi poliçesini okuduğumu ve anladığımı onaylıyorum. Yukarıda vermiş olduğum tüm bilgiler doğrudur. Verilen bilgilerin herhangi birinde değişiklik söz konusu olur ise bu durumu derhal ETKO Genel Müdürüne bildireceğimi ve yeni bir açıklama formu düzenleyeceğimi taahhüt ederim. Ayrıca benim veya aile üyelerimden herhangi birisinin yakını veya ticari ilişkisi bulunan hiçbir kuruluşun sertifikasyonunun değerlendirilmesinde (tüm süreç dâhil) bulunmayacağımı ve ETKO tarafından belgelendirilen ürünlerin pazarlanması faaliyetlerinde bulunmayacağımı taahhüt ederim.

Tarih	06.01.2017	İmza
İsim	Elif Demirel Gökdemir	Elif

(Lütfen formu geri iade ediniz)

Hazırlayan: KYS Sorumlusu, Onaylayan: Genel Müdür

	GİZLİLİK VE İLGİ ÇELİŞKİSİ SÖZLEŞMESİ	BELGE NO.	GP 08 F 01
		TARİH	01.05.2014
		REV. NO	04
		SAYFA	1/2

Bu sözleşme ETKO tarafından işe alınmış, kontrat imzalanmış veya ticari faaliyetinde görev alan çalışan tüm personele, memurlara, sözleşmeli personele, gönüllü çalışanlara uygulanır fakat bu şahıslar ile sınırlandırılmaz. Bu anlaşma gizlilik taşıyan olay ve iş ile ilgili konularda taraflarca edinilen bilgilerin gizli kalacağını ve 3.cü şahıslara, resmi veya yetkili mercilerce istenmedikçe açıklanmayacağını taahhüt etmektedir. ETKO personeli bu anlaşmadaki ve GP 08 prosedüründe yazılı tüm maddeleri ve kuralları anladığını kabul ettiğini beyan etmektedir.

1. GİZLİLİK

- 1.1. ETKO tarafından oluşturulan, ilgili olan veya ETKO tarafından kaynaklanan tüm veri, malzeme ETKO' nun imtiyazındadır ve yüksek gizlilik derecesi taşır. Tüm sayfalar, formlar, tasarımlar belgeler, poliçeler, prosedürler, kararlar ve kaynaklar gizlidir ve ETKO' nun malıdır.
- 1.2. Yukarıda yazılı bilgilerden hiçbir ETKO' nun yazılı onayı olmadan paylaşılamaz. Aksi durumda anlaşmada yazılı tüm koşullar kovuşturma ile sonuçlanabilir veya kanun tarafından cezalandırılır.

2. İLGİ ÇELİŞKİSİ

- 2.1. ETKO' nun hiçbir organizasyonel birimi veya herhangi bir personel ve sözleşmeli personel ETKO tarafından sertifikalandırılan başvuru sahibinin üretim desenini tedarik etme yetkisine sahip değildir. Sertifikanın alınmasına engel olacak konularda, problemler alanlarda veya potansiyel uygunsuzluklar hakkında ETKO personelinin danışmanlık hizmeti vermesi veya tavsiyede bulunması ayrıca tarafsızlığı, gizliliği sarsacak, ilgi çelişkisine neden olabilecek dolayısı ile ETKO'nun sertifikasyon prosesini ve kararlarını etkileyebilecek hizmetlerin ETKO personeli tarafından yürütülmesi yasaktır.
- 2.2. Başvuran müşterinin sertifikalandırma talebini değerlendirmekle yükümlü (buna müşteri dosyasının gözden geçirilmesi, komite personelinin dosyayı gözden geçirmesi ve kontrolör dâhildir) tüm ETKO personelinin müşteri ile ilgili ticari ilişkisinin bulunmaması gerekir. Sertifika talebi için başvuru dosyasını gözden geçiren, saha denetimine çıkan, sertifikasyon içim belgelendirme önerisinde bulunan veya sertifikasyon için karar veren tüm ETKO personeli ve ETKO'ya bağlı sözleşmeli personel gizlilik ve ilgi çelişkisi anlaşmasındaki tüm maddelere uyum sağlamakla yükümlüdür.
- 2.3. ETKO çalışanlarının, kontrolörlerinin veya personelinin kontrol ettikleri işyerlerinden hiçbir şekilde, yazılı olan ücret dışında, para tahsil edemezler, hediye veya benzeri eşyaları kabul edemezler.
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- 2.5. Bir kontrol ile görevlendirilen herhangi bir personel, sertifikasyon veya değerlendirmesini yapmak üzere görevlendirildiği ürünün tasarımcısı veya üreticisi ile işvereni veya kendisi açısından var olan herhangi bir geçmiş veya mevcut bağlantısını beyan edecektir.
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Tarih	06.01.2014	İmza
İsim	Elif Duman Gökdeniz	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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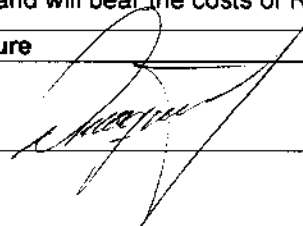
This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	A-Tayyar DOĞAN	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?:

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ **No** ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ **No** ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

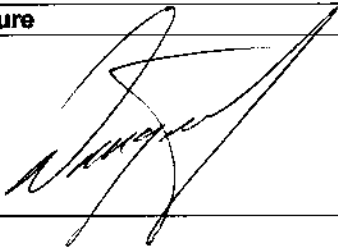
The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>A. Tayyar DOĞAN</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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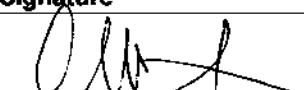
This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

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2. CONFLICT OF INTEREST

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Date	02.01.2016	Signature
Name	Hakan KARABARAK	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *Advising Committee*

If you are an ETKO employee, what is your job title and to whom do you report? *General Manager*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

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The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Hakan KARABACAK</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
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Date	02.01.2016	Signature
Name		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?:

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ___ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☒ No ___ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: CEYLAN ARIKULU


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: 500 €

The date this relationship was established: 2004

Who, if anyone, approved and monitors this relationship on behalf of ETKO: Orhan Fren Ceylan

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Hüseyin CEYLAN	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	<i>Harriet G. Lee</i>	<i>[Signature]</i>

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *tarabizlik borte ayasi*

If you are an ETKO employee, what is your job title and to whom do you report? *_____*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person: *_____*

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: *_____*


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: *_____*

The date this relationship was established: *_____*

Who, if anyone, approved and monitors this relationship on behalf of ETKO: *_____*

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: *_____*

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Adnan Aliyev</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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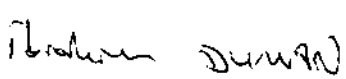

This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

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Date	02.01.2016	Signature
Name		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *Committee Member*

If you are an ETKO employee, what is your job title and to whom do you report? *---*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): *---*

The name of the entity: *---*


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: *---*

The date this relationship was established: *---*

Who, if anyone, approved and monitors this relationship on behalf of ETKO: *---*

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: *---*

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Isakim Duman</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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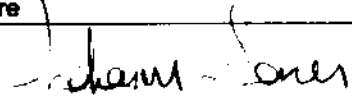
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Date	02.01.2016	Signature
Name	AU ERDOGAN, ONAR	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: **DANIŞMAN (HUKUK)**

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): —

The name of the entity: —

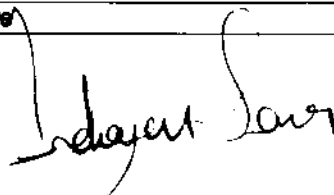
The entity's business relationship to ETKO and Euro/Dollar value of this relationship: —

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: —

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Av. ERDOĞAN SONAR	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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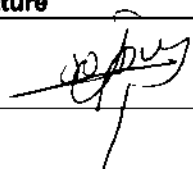
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Date	02.01.2016	Signature
Name	Orhan Savuksu	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *Committee member*

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

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Yes ☒ No ___ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: *Torateks AS*

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: *1300 Euro*

The date this relationship was established: *2008*

Who, if anyone, approved and monitors this relationship on behalf of ETKO: *Mustafa Akyuz*

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

None

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Date	02.01.2016	Signature
Name	<i>Orhan Sovukcu</i>	<i>[Signature]</i>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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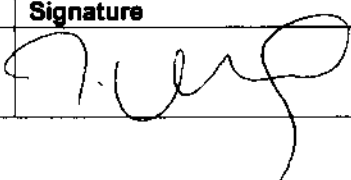
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Date	02.01.2016	Signature
Name	TAGA Uskug	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Committee Member

If you are an ETKO employee, what is your job title and to whom do you report?: —

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

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Yes ☒ No ☐ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: TORATEKS A-Ş

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: 1300 Euro

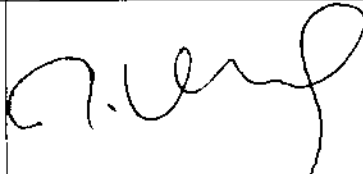
The date this relationship was established: 2008

Who, if anyone, approved and monitors this relationship on behalf of ETKO: Mustafa AKYÜZ

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

None

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	TOLGA USKULU	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	Levent Kahraman	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: *Committee Member*

If you are an ETKO employee, what is your job title and to whom do you report?: —

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): —

The name of the entity: *Laber Kimya*

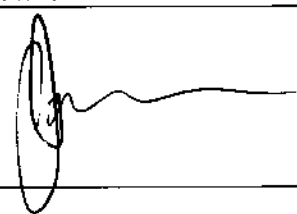
The entity's business relationship to ETKO and Euro/Dollar value of this relationship: *1600€*

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: *Mustafa AKYUZ*

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: *none*

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Levent Kahraman</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	Artem Cherkunsh	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *employee*

If you are an ETKO employee, what is your job title and to whom do you report? *Inspector*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): —

The name of the entity: —


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: —

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: —

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: —

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Alejo Chepnysh</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	Vasyi GECHO	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: *employee*

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

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The name of the entity:

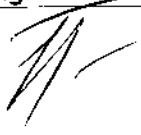
The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.:

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Date	02.01.2016	Signature	
Name	<i>Lasy GECHU</i>		

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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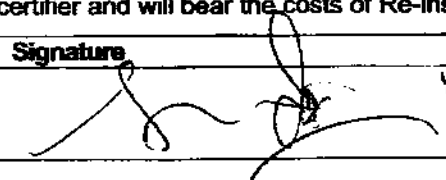
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Date	02.01.2016	Signature
Name	S. Muthukumar	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., ☒ subcontractor, employee)?:

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person: .

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: NA

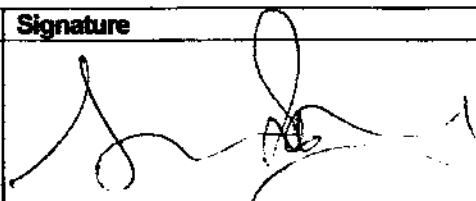
The entity's business relationship to ETKO and Euro/Dollar value of this relationship: NA

The date this relationship was established: NA

Who, if anyone, approved and monitors this relationship on behalf of ETKO: NA

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: .

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Date	02.01.2016	Signature
Name	J. Muthukumar	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	m. ghelani	m. ghelani

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: NA

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: NA

The date this relationship was established: NA

Who, if anyone, approved and monitors this relationship on behalf of ETKO: NA

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

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Date	02.01.2016	Signature
Name	m. gheela	m. gheela

(Please return the completed form)

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT		
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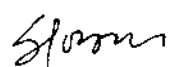
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- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	YOUNGDAE SEO	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Subcontractor

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

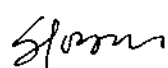
The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	YOUNGDAE SEO	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
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- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	Asher Bilal	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: **Subcontractor**

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No X If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No X If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Asher Bilal	

(Please return the completed form)

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT		
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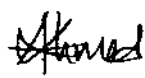
This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

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2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and its decisions.
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- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
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Date	02.01.2016	Signature
Name	Kamal Ahmed	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: **Subcontractor**

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No X If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No X If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

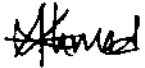
The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Kamal Ahmed	

(Please return the completed form)

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT		
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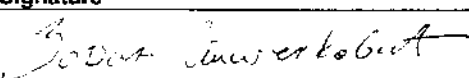
This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

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2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
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- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
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Date	02.01.2016	Signature
Name	Zoran Stankovic	

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT		
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: *Subcontractor*

If you are an ETKO employee, what is your job title and to whom do you report?: *General manager*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>Zoran Stankovic</i>	<i>Zoran Stankovic</i>

(Please return the completed form)

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT

This agreement is not limited to all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will ensure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State officer or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 05.

1. CONFIDENTIALITY

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Date	02.01.2016	Signature
Name	ETKO	

**AGREEMENT for CONFIDENTIALITY AND
CONFLICT OF INTEREST DISCLOSURE REPORT**

CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g. subcontractor, employee)?

If you are an ETKO employee, what is your job title and to whom do you report?

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ___ If yes, please provide the name, relationship to you, and job title and department for each such person:

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Yes ___ No ___ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:

The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date the relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Heinz Hübner	H. Hübner

(Please return the completed form.)

AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT

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Date: 02-14-2016
Name: _____

Signature: _____

**AGREEMENT for CONFIDENTIALITY AND
CONFLICT OF INTEREST DISCLOSURE REPORT**

CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members.)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions

What is your position in ETKO (e.g. subcontractor, employee)? EMPLOYEE

If you are an ETKO employee, what is your job title and to whom do you report?

Is a member of your immediate family employed by ETKO certified operator? Yes No If yes, please provide the family relationship to you, and job title and department for each such person:

Do you or does a member of your immediate family have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes No If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you)

The name of the entity

The entity's relationship to ETKO and Euro/Dollar value of this relationship

The date the relationship was established

Who has been authorized and authorized this relationship on behalf of ETKO.

The nature of you or the family member's interest in the entity (e.g. employment, board seat, ownership interest) and the approximate monetary value, if any, of that interest

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date 02.01.2018

Signature

Name

(Please attach the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? SUBCONTRACTOR

If you are an ETKO employee, what is your job title and to whom do you report?:

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

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The name of the entity:

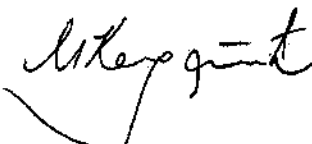
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The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	MILENKO KOSUTIC	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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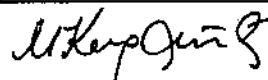
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- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	MILENKO KOSUTIC	

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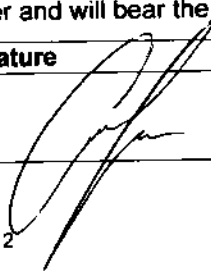
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Date	02.01.2016	Signature
Name	Gibson NADAS	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Employee

If you are an ETKO employee, what is your job title and to whom do you report? Accounting / Gen. Man.

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

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Date	<u>02.01.2016</u>	Signature
Name	<u>Carlson NABAS</u>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	Fahra Arman ERDEM	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? *Employee*

If you are an ETKO employee, what is your job title and to whom do you report? *Inspector*

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): —

The name of the entity: —

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: —

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: —

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: —

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Date	02.01.2016	Signature
Name	<i>Fatma Arman ERDEM</i>	<i>[Signature]</i>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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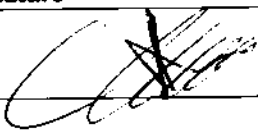
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Date	02.01.2016	Signature
Name	Uğur ŞİMDİ	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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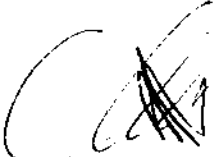
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The date this relationship was established: ☐

Who, if anyone, approved and monitors this relationship on behalf of ETKO: ☐

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Date	02.01.2016	Signature
Name	Ugur SIMDI	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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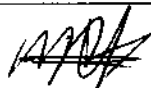
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Date	02.01.2016	Signature
Name	Mehmet Arıkoğlu	

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CONFLICT OF INTEREST DISCLOSURE FORM

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The name of the entity: _____

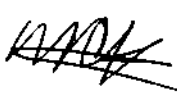
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The date this relationship was established: _____

Who, if anyone, approved and monitors this relationship on behalf of ETKO: _____

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Date	02.01.2016	Signature
Name	Mehmet Ali Görmüş	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	ERDEM ARKUS	

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Please provide answers to the following questions: *Employee*

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If you are an ETKO employee, what is your job title and to whom do you report?:

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I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<i>FRAN AARLS</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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2. CONFLICT OF INTEREST

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- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	Koray Ercan	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Employee

If you are an ETKO employee, what is your job title and to whom do you report? Inspector/gm-man

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): ---

The name of the entity: ---


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: ---

The date this relationship was established: ---

Who, if anyone, approved and monitors this relationship on behalf of ETKO: ---

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: ---

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Koray Ozcan	

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Date	02.01.2016	Signature	/ /
Name	(b) (6), (b) (7)(C)		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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If you are an ETKO employee, what is your job title and to whom do you report? Inspector / Gen. man

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Date	02.01.2016	Signature
Name	(b) (6), (b) (7)(C)	

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Date	02.01.2016	Signature
Name	<div style="background-color: black; color: red; padding: 5px;">(b) (6), (b) (7)(C)</div>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature	(b) (6), (b) (7)(C)
Name	(b) (6), (b) (7)(C)		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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Employee

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Date	02.01.2016	Signature	
Name	(b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)

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Date	02.01.2016	Signature
Name	D. Enne A. Enne	S. Grotz

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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The name of the entity: —

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: —

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: —

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: —

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Date	02.01.2016	Signature
Name	<u>D. Enne C. 1234</u>	<u>[Signature]</u>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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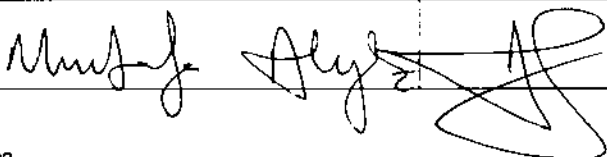
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Date	02.01.2016	Signature
Name		

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*Managing Director
Employee.*

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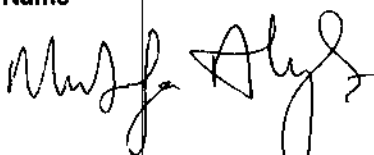
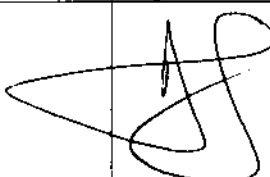
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Date	02.01.2016	Signature
Name	 	

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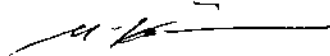
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Date	02.01.2016	Signature
Name	Metin Yuce ERINO	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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If you are an ETKO employee, what is your job title and to whom do you report? Inspector - Gm. man.

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity:


The entity's business relationship to ETKO and Euro/Dollar value of this relationship:

The date this relationship was established:

Who, if anyone, approved and monitors this relationship on behalf of ETKO:

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	<u>Mehmet Yüce Zengin</u>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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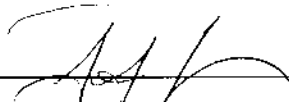
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Date	02.01.2016	Signature
Name	Fatih AKSOY	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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Employee

If you are an ETKO employee, what is your job title and to whom do you report?:

Controller - to Gen. Man.

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you):

The name of the entity: _____

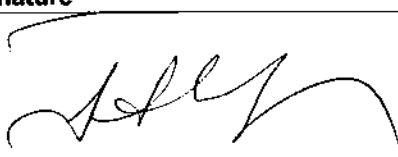
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The date this relationship was established: _____

Who, if anyone, approved and monitors this relationship on behalf of ETKO: _____

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: _____

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Date	02.01.2016	Signature
Name	<i>Raffi AKSOY</i>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	Uğur YILMAZ	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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Please provide answers to the following questions:

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If you are an ETKO employee, what is your job title and to whom do you report?: Controlor / G.N. Men

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

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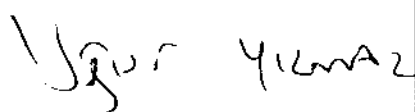

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Date	02.01.2016	Signature
Name		

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	(b) (6), (b) (7)(C)	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

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Date	02.01.2016	Signature
Name	<div style="background-color: black; color: red; padding: 5px;">(b) (6), (b) (7)(C)</div>	

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	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Name	(b) (6), (b) (7)(C)	

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Date	02.01.2016	Signature
Name	<div style="background-color: black; color: red; padding: 5px;">(b) (6), (b) (7)(C)</div>	

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Date	02.01.2016	Signature
Name	Oznu Kulu	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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The date this relationship was established: —

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Date	02.01.2016	Signature
Name	<u>Ozmir Kure</u>	<u>[Signature]</u>

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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This agreement applies, but is not limited to, all staff, officers, contractors, volunteers and any other persons associated with, employed by, contracted to, or otherwise involved in the business activities of ETKO. This agreement will insure that all confidential matters and business related matters disclosed by each party will be kept confidential and not shared with any third party, with the exception of the Secretary or the applicable State official or their authorized representatives. ETKO personnel understand and accept all clauses and the consequences of the rules set by ETKO in this agreement and procedure GP 08.

1. CONFIDENTIALITY

- 1.1. All data, materials, knowledge and information generated through, originating from, or having to do with ETKO is privileged and highly confidential. All pages, forms, designs, documents, printed matter, policies and procedures, decisions, and resources are confidential and the sole property of ETKO.
- 1.2. None of the above information may be shared without the express written consent of ETKO. Failure to honor all the conditions of this agreement may result in prosecution and/or any resultant penalties as provided by the law.

2. CONFLICT OF INTEREST

- 2.1. No organizational unit of ETKO, or no personnel and subcontracted body/personnel is allowed to supply to the applicants design of products of the type it is certified by ETKO, to provide advice or consultancy service for the problematic areas or potential nonconformities which are barriers to the certification, any other products or services which harm the impartiality, confidentiality, creating conflict of interest, and thus effecting certification process of ETKO and it decisions.
- 2.2. All ETKO individuals involved with processing an applicant's request (this includes document review person, review committee person, and inspector) for certification must have no current business relationship with applicant. 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 will complete an annual conflict of interest disclosure report
- 2.3. Employees, inspectors, contractors, or other personnel are not permitted to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
- 2.4. Any person with conflicts of interest shall be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest, or has provided consulting services within the 24-month period prior to the application for certification any prior and/or present association on his own part, or on the part of his employer, with a supplier or designer of products to the evaluation or certification.
- 2.5. Any personnel assigned to an inspection job, shall declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are assigned.
- 2.6. If it is discovered that an ETKO employee involved in the certification process had a conflict of interest with in the past 24 months prior to certification, the application will be reconsidered with all subsequent costs associated with the recertification the responsibility of ETKO OR ETKO will refer applicant to another certifier and will bear the costs of Re-inspection.

Date	02.01.2016	Signature
Name	Ekrem GÜLER	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)?: Employee

If you are an ETKO employee, what is your job title and to whom do you report?: inspector / G.N. mer.

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): _____

The name of the entity: _____

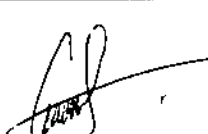
The entity's business relationship to ETKO and Euro/Dollar value of this relationship: _____

The date this relationship was established: _____

Who, if anyone, approved and monitors this relationship on behalf of ETKO: _____

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: _____

I certify that I have read and understand the ETKO's conflict of interest policy and that the foregoing information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided above, I will immediately notify the Managing Director and complete an amended disclosure form. I further agree that I will refrain from participating in ETKO's consideration of any proposed business or financial relationship in which I or a member of my immediate family may be interested, except to respond to questions or to provide further information.

Date	02.01.2016	Signature
Name	Ekrem GÜLER	

(Please return the completed form)

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Date	02.01.2016	Signature
Name	Elena Mihela Aluylo	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Employee

If you are an ETKO employee, what is your job title and to whom do you report? Customer Relations

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): ---

The name of the entity: ---


The entity's business relationship to ETKO and Euro/Dollar value of this relationship: ---

The date this relationship was established: ---

Who, if anyone, approved and monitors this relationship on behalf of ETKO: ---

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest:

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Date	02.01.2016	Signature
Name	Elena Muela Alayza	

(Please return the completed form)

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Date	02.01.2016	Signature	
Name	(b) (6), (b) (7)(C)		

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

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Please provide answers to the following questions:

What is your position in ETKO (e.g., subcontractor, employee)? Employee

If you are an ETKO employee, what is your job title and to whom do you report? Inspector Gen. Men

Is a member of your immediate family employed by ETKO certified operator? Yes ☐ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ☐ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): —

The name of the entity: —

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: —

The date this relationship was established: —

Who, if anyone, approved and monitors this relationship on behalf of ETKO: —

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest: —

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Date	02.01.2016	Signature
Name	<div style="background-color: black; color: red; padding: 5px;">(b) (6), (b) (7)(C)</div>	

(Please return the completed form)

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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Date	02.01.2016	Signature
Name	(b) (6), (b) (7)(C)	

	AGREEMENT for CONFIDENTIALITY AND CONFLICT OF INTEREST DISCLOSURE REPORT	
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CONFLICT OF INTEREST DISCLOSURE FORM

(This section is also valid for the certification committee members)

Please state below in which activities you might take place in the mentioned year. (Such as consultancy of companies which work with ETKO, or jobs that may prohibit you to take certification decisions in the name of ETKO, etc.)

Please provide answers to the following questions: *Employee*

What is your position in ETKO (e.g., subcontractor, employee)?:

If you are an ETKO employee, what is your job title and to whom do you report?: *Inspector / Gen. Manager*

Is a member of your immediate family employed by ETKO certified operator? Yes ___ No ☒ If yes, please provide the name, relationship to you, and job title and department for each such person:

Do you, or does a member of your immediate family, have or propose to have a business or financial relationship with ETKO certified client, either directly or through another entity in which you or the family member has a significant interest?

Yes ___ No ☒ If yes, for each such relationship, please provide the following information:

The name of the person involved (either yourself or the family member and his or her relationship to you): ___

The name of the entity: ___

The entity's business relationship to ETKO and Euro/Dollar value of this relationship: ___

The date this relationship was established: ___

Who, if anyone, approved and monitors this relationship on behalf of ETKO: ___

The nature of your or the family member's interest in the entity (e.g., employment, board seat, ownership interest), and the approximate monetary value, if any, of that interest.: ___

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Date	02.01.2016	Signature
Name	(b) (6), (b) (7)(C)	

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Garip YILMAZ (# Uncle) Maui Deniz

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Yes ☐ No ☒ If yes, for each such relationship, please provide the following information: _____

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

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Date	02.01.2016	Signature
Name	Huseyin OZER	

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Date	02.01.2016	Signature
Name	Huseyin Ozer	

(Please return the completed form)

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ETKO Inspection and Certification fees for national and international projects.

ETKO Ulusal ve Uluslararası projeler için kontrol ve sertifikasyon ücretleri

This procedure is applicable for both announced and unannounced inspections.

Bu prosedür haberli ve habersiz denetimler için geçerlidir.

Prior to Licensee Contract signed, ETKO and client will be agreed on for a basic fee related to the following fee schedule.

Lisans Anlaşması imzalanmadan önce ETKO ve Müteşebbis aşağıda belirtilen ücret tablosuna göre bir fiyatta mutabık kalırlar.

ETKO inspect and certify according to TC 27676/2010, EU Equivalent Standard IACB, NOP Regulation, COR, BIOSUISSE, NATURLAND, İTU – GLOBALGAP, HACCP, GOTS Global Organic Textile Standard, TE- OCS Textile Exchange –Organic Content Standards and COSMOS Cosmetic Standard.. ETKO TC 27676/2010, EU Eşdeğer Standardı IACB, NOP, COR, BIOSUISSE, NATURLAND Yönetmelikleri, İTU - GLOBALGAP HACCP ve GOTS Global Organik Tekstil Standardları, TE-OCS Textile Exchange Organik Content Standardları ve COSMOS Cosmetic Standartlarına göre kontrol ve sertifikasyon işlemi yapar.

Inspection cost (on site controls, analyses, reporting, inspector travel and preparation times, travelling and boarding costs).

Kontrol masrafları (alan kontrolü, tahlil, büro çalışmaları, kontrol seyahat ve hazırlık süresi, seyahat masrafları)

****Müteşebbise verilecek toplam ücret hesaplanırken ücretlendirme gösterge çizelgesi dikkate alınır.**

****Total estimation will be based on the fee schedule described in the Fee Calculation List.**

Subject - Kontrol	(Per) Inspector Kontrolör	Per day (Euro) Abroad projects Günlük yurtdışı projeleri	Per day (Euro) Turkey projects Günlük yurtiçi projeleri
Organic Agriculture/Processing/Export Organik Ziraî Üretim/İşletme/İhracat, per scope	Inspector	500	500*
<i>Additional charge for big units, >1000 ha farm. 1000 ha dan büyük üretim işletmeleri için ilave ücret.</i>	Inspector	250	250
Organic Agriculture Grower Group Organik Ziraî Üretim Üretici Grupları	Inspector	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory
Organic Food industry – Organik Gıda Sektörü Small Units/Küçük işletmeler. < 250 tons/year	Inspector	500	500
Organic Food industry – Organik Gıda Sektörü Medium size Units/Orta boy işletmeler. Between 250-1000 tons/year	Inspector	750	750
Organic Food industry – Organik Gıda Sektörü Big Units/Büyük işletmeler > 1000 tons/year	Inspector	1000	1000
<i>Textile industry – Tekstil Sektörü. Country base approach for India-Pakistan and Bangladesh is applied, per quota.</i>	Inspector	1000 + GOTS and/or TE License Fee	1000 + GOTS and/or TE License Fee
<i>*Textile and COSMOS input producer – Tekstil ve COSMOS girdi üreticisi</i>	Inspector	1000 + Cosmos License Fee	1000 + Cosmos License Fee
<i>*Sampling per sample – Örnekleme başına</i>		250	150
<i>Production inputs, fertiliser, pesticide etc.. Gübre, ilaç vb üretim girdileri</i>	Dealer: Satıcı: Ürün başına Per product	750 50	750 50
<i>İTU Certification</i> İTU Sertifikasyonu	Inspector	-	500
<i>GLOBALGAP Certification</i> GLOBALGAP Sertifikasyonu	Inspector	750 + General GG Fees	750 + General GG Fees
<i>İTU+GLOBALGAP Certification</i> İTU+GLOBALGAP Sertifikasyonu	Inspector	1000 + General GG Fees	1000 + General GG Fees
<i>İTU and GLOBALGAP Grower Group Certification</i> İTU ve GLOBALGAP Üretici Grubu Sertifikasyonu	Inspector	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory + General GG Fees	Üretici sayısına istinaden teklif düzenlenir. Offer per quota is obligatory + General GG Fees
<i>HACCP Certification - Sertifikasyonu</i>	Inspector	750	750
<i>COSMETICS-COSMOS and CLEANING AGENTS</i>	Inspector	900	900

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Preparation, reporting Denetleme hazırlık ve raporlama	Inspector	500	500
Travel time- Seyahat günlüğü	Inspector	350	350
Follow up certification Sertifikasyon işlemlerinin takibi	ETKO Stuff- ETKO personeli	500	500
Issuance, verification transaction certificates, Satış sertifikalarının düzenlenmesi	ETKO Stuff- ETKO personeli	350	350
Plus travel expenses – seyahat giderleri			
<p>Plane – bus – train – boat or taxi tickets which is applicable.</p> <p>Kontrol yerine geliş için hangi araç (otobüs – tren – vapur – taksi veya uçak) daha uygun ise bilet ücreti.</p> <p>In case inspector needs to drive company car, 0,20 Euro cent is charged per km travel.</p> <p>Şayet kontrolör şirket arabasıyla gelmek durumunda kalırsa km başına 0,20 Euro sent masraf talep edilir.</p> <p>Further administrative performances, issue of certificates on presentation of necessary documents, preparing import license to European Union and recertification:</p> <p>Diğer idari işler: Genel ve Satış sertifikalarını düzenlenmesi, yurtiçi veya AT ithalat izinlerinin düzenlenmesi, ve resertifikasyon yurtiçi veya AT.</p>			
Certification programs: TC 27676/2010, EU Equivalent Standard, NOP, COR, BIOSUISSE, NATURLAND Regulations, GOTS Textile Standards, TE-OCS Textile Exchange Organic Content Standards, İTU-GLOBALGAP, HACCP and COSMOS			EURO
Update of Master Certificate or annex related to products Genel sertifikanın veya eklerinin ürüne bağlı olarak yeniden düzenlenmesi			150
Additional product(s), processing/trading unit or agricultural unit minimum fee. Depends on the size of the unit above mention fees applied. İlave ürün(ler), işletme/pazarlama ünitesi veya zirai üretim alanının dahil edilmesi en düşük ücret. İşletmenin büyüklüğüne göre yukarıdaki listelenen fiyatlar uygulanır.			250
Additional operators certificate, or farmers registration documen for credit application İlave istenecek genel sertifika veya kredi başvurusu için üreticiye düzenlenecek sertifikalıdır belgesi			30
Lot related inspection certificate for import-export Ürünlerin alım-satımında düzenlenecek olan ürün sertifikası başına			40
Lot related inspection certificate for internal sales in small quantity only. Quantities exceeds 10000 TL= 5000 EURO=7000 USD value is subject to 40 euro fee. Ürünlerin iç piyasada küçük miktarlarda satışı esnasında düzenlenecek olan ürün sertifikası başına. Bu sadece küçük miktarlar için geçerlidir. Baz alınacak değer (10000 TL, 5000 EURO, 7000 USD dir.)			Per quata, per offer – Teklif düzenlenir
Preparation application for import authorisation TR (re-certification for the moment) Türkiye için hazırlanacak olan İthal İzin Başvurusu (şu anda resertifikasyon)			150
Preparation application for recognition of ETKO clients documents by another control body Yurtiçinde ETKO müşterisinin dökümanlarının hazırlanarak başka bir kontrol kuruluşuna verilmesi			50
Registration fee of the producers in producer groups to the ministry database per producer - Üretici gruplarında üreticilerin bakanlık veritabanına kaydedilmesi herbir üretici için			5
Recognition of certification done by other control bodies (recertification). Translation costs will be burned by the applicant. Diğer kontrol ve sertifikasyon kuruluşlarının sertifikalandırmış olduğu ürünlerin yeniden ETKO tarafından sertifikalandırılması. Tercüme gerekliyse masrafları başvuru yapan kişiye ait olacaktır.			EC 150 TC 50
Private Standards obligatory payments will be invoiced according to private standards requirements. Özel standartlara ait ilave ücretler müteşebbise standardın talebine göre fatura edilecektir. Örneğin GOTS tekstil ünitesi başına 120 euro lisans ücreti ve 30 euro yıllık ücret talep etmektedir. Cosmos toplam ciro üzerinden ücret tespit etmektedir. Example: GOTS requires 120 Euro per unit as Licensee fee and 30 Euro Annual Fee for textile units. For textile inputs 25 euro per product. Cosmos requires fees related to turnover			Standard requirement
ETKO charges additional evaluation fee for Textile Input per product ETKO tekstil kimyasallarının değerlendirilmesiyle ilgili olarak ürün başına değerlendirme ücreti .			75 euro
Investigation of irregularity charge (only reporting per incident) – Uygunlukların raporlanması (olay başına). Follow audits subject to daily inspection charges and other related costs. Takip denetim masrafları yukarıda belirtildiği şekilde yansıtılır.			350

Prices are based on Euro but TL maybe paid. Ücretler EURO cinsinden olup karşılığı TL ödeme yapılabilir.

Prices do not include TVA, Verilen ücretler KDV içermez.

Sampling does not include postage and the analyses costs by an accredited laboratory

Örnekleme ücreti örneğin laboratuvara ulaştırılması ve tahlil edilmesini kapsamaz. Licensee will be charged for extra travel or administration costs occurred.

İlave seyahat veya dökümantasyon işi oluşması durumunda oluşacak ilave masraflar müşteriye yansıtılır.

This form is delivered to licensees with the licensee contract. Bu form müşteriye Lisans Anlaşmasıyla birlikte ulaştırılır.

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Conditions of nonrefundable fees: Geri iadesi yapılmayan ücretler

To protect both sides from any mistake to be responsible for all losses which are not correct or deserved by the operator or ETKO; following procedure was developed for nonrefundable fees:

Olası bir hata veya değişiklik sonucunda doğacak kayıpların ETKO veya operatorün herhangi bir haksızlığa maruz kalmaması için “iadesi yapılmayan ücretler” konusunda aşağıda ifade edilen kurallar geçerli olacaktır.

Application-Başvuru: Fees for the first application and separate additional application for different processing or production locations, all fees paid. İlk başvuruda ve yeni bir işletme veya üretim alanı için ayrı başvuru yapılması durumunda yapılan bütün ödemeler

The first payment of total annual fee in case the first inspection was planned and the licensee was informed inspection dates. The first payment is usually $\frac{1}{2}$ of the annual inspection fee. Şayet ilk denetimle ilgili plan yapılmış ve müteşebbise plan gönderilmiş ise toplam yıllık ücretin ilk ödemesi. İlk ödeme yıllık ödemenin genellikle $\frac{1}{2}$ üdür.

Inspection-Denetim: If applicant wants to withdraw application, as a result of nonconformities were found during the inspection or document review, all fees paid. Şayet dökümanların incelenmesi veya ilk denetim esnasında uygunsuzluk tesbit edilmiş ve müteşebbis başvurusunu geri çekmek istemiş ise yapılan bütün ödemeler.

If applicant wants to change the certification operation to another inspection body in the middle of the inspection season, all fees paid. Müteşebbis denetim sezonunun ortasında sertifikasyon kuruluşunu değiştirmeyi isterse, yapılan bütün ödemeler.

Certification-Sertifikasyon: If cancellation, temporary or permanent suspension of certification of the operation was decided by ETKO, all fees paid. ETKO tarafından sertifikasyonla ilgili olarak iptal, geçici veya sürekli askıya alma kararı alınmış ise yapılan bütün ödemeler.

Appeal-İtiraz: After an appeal process if a re-inspection and review or any other costs associated with this confirmation needed. Herhangi bir hukuksal dava durumunda yapılacak olan denetim ve değerlendirmelerle ilgili olan veya doğabilecek diğer masraflarla ilgili yapılan veya yapılacak olan ödemeler.

PREPARED	APPROVED
QUALITY MANAGEMENT RESPONSIBLE	MANAGING DIRECTOR

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WBT Tarım Ürünleri San. Tic.
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O.S.B 2.cad. No: 10
Antalya
TÜRKİYE

bi N°: TR-088.001 BURDUR

07.10.2016/ ST

Notification of Noncompliance***NOP Uygunsuzluk Bildirimi***

Dear Sir or Madame,
Sayın İlgili,

Bio.inspecta wishes to advise you of the certification of your operation. Based on the findings of the **additional unannounced inspection** on **05.10.2016** we conclude that your operation complies with most of the requirements of the **National Organic Program (NOP)**.

In order to maintain the certification please refer to the stated date, by which a rebuttal or correction of each noncompliance must be handed in to bio.inspecta. Furthermore please submit supporting documentation of each such correction when correction is possible.

bio.inspecta işletmenizin sertifikasyonu ile ilgili sizi bilgilendirmek ister. 05.10.2016 tarihindeki habersiz ek denetim bulgularına dayanarak işletmenizin Ulusal Organik Program (NOP) gereklerinin çoğu ile uyumlu olduğu sonucuna varmış bulunuyoruz.

Sertifikasyonun sürdürülmesi için lütfen bio.inspecta ya teslim edilmek zorunda olan her uygunsuzluğun düzeltilme veya reddedilme tarihine bakınız. Ayrıca, düzeltmenin mümkün olduğu durumlarda lütfen her bir düzeltme için destekleyici dokümanları sununuz.

Relevant sections of the NOP <i>NOP ilgili bölümü</i>	Facts upon which the notification of noncompliance is based <i>Uygunsuzluk bildiriminin dayandırıldığı olgular</i>	Deadline <i>Termin</i>	Type of sanction <i>Yaptırım tipi</i>
§ 205.103	113-BTE: Üretici 308/30 ve 0/137 nolu parsellerin bakımını yapmaktadır. Kullanım hakkını gösterir belgeler sunulamadı./Farmer use all of the fields for 308/30 and 0/137 parcel. The updated documents that shows the usage right were not submitted.	2017 kontrolü/ 2017 inspection	MN

Further verification of implementation of appropriate measures will be conducted during the next inspection.

Uygun önlemlerin yerine getirildiğinin detaylı doğrulanması bir sonraki denetim esnasında gerçekleşecektir.

In the annex you find the certification status per plot.

Ekte her arazi için sertifikasyon statüsüne bakınız.

Yours sincerely,

Saygılarımızla,

bio.inspecta AG

SEVGİ TÜRKÖZ

Agriculture, Processing



Explanation of types of sanction/ *Yaptırım tiplerinin açıklaması*

Type of sanction	
0	= Recommendation (no noncompliance) concerning present procedures where might be noncompliance resulting in future./ <i>Tavsiye (uygunsuzluk değil), gelecekte uygunsuzlukla sonuçlanabilecek mevcut durumlarla ilgili.</i>
MN	= Minor deviation from the Regulation. A written notification of noncompliance is imposed. Evidence of corrective actions must be provided with the next Organic Handling System Plan. Implementation will be verified during next inspection. If no corrective actions are implemented by the deadline indicated, a major deviation will be imposed (see MN2)./ <i>Yönetmelikten minor uygunsuzluk.. Uygunsuzluğun yazılı bildirimi uygulanır. Düzeltici faaliyetlerin kanıtları bir sonraki Organik İşleme Sistem Planı ile sağlanmalıdır. Uygulama bir sonraki denetim esnasında doğrulanacaktır. Eğer belirtilen terminden itibaren hiçbir düzeltici faaliyet uygulanmazsa, major uygunsuzluk uygulanacaktır (MN2 ye bakınız).</i>
MN2	= Major Minor deviation from the Regulation. A written notification of noncompliance is imposed. Evidence of corrective actions must be provided prior to certification. If no corrective actions are implemented by the deadline indicated, a proposed suspension of certification will be imposed./ <i>Yönetmelikten major uygunsuzluk. Uygunsuzluğun yazılı bildirimi uygulanır. Düzeltici faaliyetlerin kanıtları sertifikasyon öncesi sağlanmalıdır. Eğer belirtilen terminden itibaren hiçbir düzeltici faaliyet uygulanmazsa, sertifikasyonun askıya alınma önerisi uygulanacaktır.</i>

Annex I: Certification status per plot

Ek I: Her arazi için Sertifikasyon statüsü

cc: Program Manager NOP/ USDA / Inspector

Bilgi: NOP Program Yöneticisi NOP/USDA/Kontrolör

Possibility of rebuttal according to NOP (USDA) in case of a Notification of Noncompliance

Uygunsuzluk bildirimi durumunda NOP (USDA)'a göre reddedilme ihtimali

If a certified operation believes the *notification of noncompliance* is incorrect or not well-founded, the certified operation may submit a rebuttal to bio.inspecta AG, as applicable, providing supporting data to refute the facts stated in the notification. The opportunity for rebuttal is provided to allow certifying agents and certified operations to informally resolve noncompliance issues. The rebuttal process should be helpful in resolving differences which may be the result of misinterpretation of requirements, misunderstandings, or incomplete information.

Sertifikalı bir operator uygunsuzluk bildiriminin yanlış olduğu ya da bir temele dayandırılmadığını düşünür ise bio.inspecta AG'ye, uygulanabilir olduğunda, bildirimde belirtilen gerçekleri reddetmek için destekleyici verileri sağlayan, itirazını sunabilir. Ret fırsatı, sertifikasyon kuruluşu ve operatöre uygunsuzluk durumlarının gayri resmi olarak çözümlenmesine izin verme amacıyla verilmektedir. Ret süreci, gereksinimlerin yanlış yorumlanması, yanlış anlaşılmalara ya da eksik bilgiden kaynaklanan farklılıkların çözümlenmesinde yardımcı olmalıdır.

Alternatively, the certified operation may correct the identified noncompliance and submit proof of such corrections. When the certified operation demonstrates that each noncompliance has been corrected or otherwise resolved, the certifying agent will send the certified operation a written *notification of noncompliance resolution*. *Alternatif olarak, sertifikalı operator tanımlanan uygunsuzluğu düzeltebilir ve bu düzeltmelerin bir kanıtını sunabilir. Sertifikalı operator her bir uygunsuzluğun kapatıldığını ya da farklı biçimde çözümlendiğini gösterdiğinde, sertifikasyon kuruluşu sertifikalı operatöre yazılı bir uygunsuzluk çözüm bildirimi gönderecektir.*

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O.S.B 2.cad. No: 10
Antalya
TÜRKİYE

bi N°: TR-088.001 BURDUR

14.07.2016 / ST

Notification of Noncompliance***NOP Uygunsuzluk Bildirimi***

Dear Sir or Madame,
Sayın İlgili,

Bio.inspecta wishes to advise you of the certification of your operation. Based on the findings of the inspection on **12.07.2016** we conclude that your operation complies with most of the requirements of the **National Organic Program (NOP)**. In order to maintain the certification please refer to the stated date, by which a rebuttal or correction of each noncompliance must be handed in to bio.inspecta. Furthermore please submit supporting documentation of each such correction when correction is possible.

*bio.inspecta işletmenizin sertifikasyonu ile ilgili sizi bilgilendirmek ister. **12.07.2016** tarihindeki denetim bulgularına dayanarak işletmenizin **Ulusal Organik Program (NOP)** gereklerinin çoğu ile uyumlu olduğu sonucuna varmış bulunuyoruz.*

Sertifikasyonun sürdürülmesi için lütfen bio.inspecta ya teslim edilmek zorunda olan her uygunsuzluğun düzeltilme veya reddedilme tarihine bakınız. Ayrıca, düzeltmenin mümkün olduğu durumlarda lütfen her bir düzeltme için destekleyici dokümanları sununuz.

Relevant sections of the NOP <i>NOP ilgili bölümü</i>	Facts upon which the notification of noncompliance is based <i>Uygunsuzluk bildiriminin dayandırıldığı olgular</i>	Deadline <i>Termin</i>	Type of sanction <i>Yaptırım tipi</i>
§ 205.103	<p>116-BTE: 1 ve 2 nolu araziler 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Plot no:1 and 2 were certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>111-BTE: 5 nolu arazi 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Plot no:5 was certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>114-BTE: Üretici 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Farmer was certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>112-BTE: Üretici 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında 1,2 ve 3 nolu arazileri için denetlendiğine dair herhangi bir belge sunulamamıştır./ Farmer was certified by Etko within WBT-Burdur project, in 2015. Any document that shows plot nu: 1,2 and 3 whether the farmer's certification in 2015 was not presented.</p>	4 hafta/ 4 weeks	MN2
§ 205.103	<p>Aşağıdaki üreticilerin arazi planlarının bir örneği sunulamadı./ It is not seen field plans of the following farmers.</p> <p>116-BTE 113-BTE 111-BTE 115-BTE 112-BTE 114-BTE</p>	4 hafta/ 4 weeks	MN2
§ 205.103	<p>113-BTE: Üretici 308/30 ve 0/137 nolu parsellerin bakımını yapmaktadır. Kullanım hakkını gösterir belgeler sunulamadı./Farmer use all of the fields for 308/30 and 0/137 parcel. The updated documents that shows the usage right were not submitted.</p>	4 hafta/ 4 weeks	MN2
§ 205.205	<p>116-BTE: 1 ve 2 nolu arazide iki yıl üst üste rezene yetiştirilmiştir. Rotasyon yapılmamıştır./Fennel is grown two consecutive years in plot no:1 and 2. Rotation was not applied.</p> <p>111-BTE: 1, 2, 3 ve 4 nolu arazide iki yıl üst üste rezene</p>	2017 kontrolü/ 2017 inspection	0

	<p>yetiştirilmiştir. Rotasyon yapılmamıştır./Fennel is grown two consecutive years in plot no:1, 2, 3 and 4. Rotation was not applied.</p> <p>115-BTE: 1 nolu arazide iki yıl üst üste buğday ve 2nolu arazide iki yıl üst üste arpa yetiştirilmiştir. Rotasyon yapılmamıştır./Wheat is grown two consecutive years in plot no:1and barley is grown two consecutive years in plot no:2. Rotation was not applied.</p>		
§ 205.201	<p>Aşağıdaki üreticilerin arazileri konvansiyonel arazi ile komşudur ve bulaşma riski mevcuttur. / There are fields with contamination risky borders for the following farmer.</p> <p>116-BTE 113-BTE 111-BTE 115-BTE 114-BTE 112-BTE</p>	Hasat sonu/ After harvest	0
§ 205.103	<p>116-BTE: Musa GENCER'e ait bakım sözleşmesi görülemedi./ Keeper's contract has not seen belongs to Musa GENCER.</p>	4 hafta/ 4 weeks	MN2

Further verification of implementation of appropriate measures will be conducted during the next inspection.

Uygun önlemlerin yerine getirildiğinin detaylı doğrulanması bir sonraki denetim esnasında gerçekleşecektir.

In the annex you find the certification status per plot.

Ekte her arazi için sertifikasyon statüsüne bakınız.

Yours sincerely,
Saygılarımızla,

bio.inspecta AG

SEVGİ TÜRKÖZ

Copy to:

Agriculture, Processing

Explanation of types of sanction/ *Yaptırım tiplerinin açıklaması*

Type of sanction	
0	= Recommendation (no noncompliance) concerning present procedures where might be noncompliance resulting in future./ <i>Tavsiye (uygunsuzluk değil), gelecekte uygunsuzlukla sonuçlanabilecek mevcut durumlarla ilgili.</i>
MN	= Minor deviation from the Regulation. A written notification of noncompliance is imposed. Evidence of corrective actions must be provided with the next Organic Handling System Plan. Implementation will be verified during next inspection. If no corrective actions are implemented by the deadline indicated, a major deviation will be imposed (see MN2)./ <i>Yönetmelikten minor uygunsuzluk.. Uygunsuzluğun yazılı bildirimi uygulanır. Düzeltici faaliyetlerin kanıtları bir sonraki Organik İşleme</i>

	<i>Sistem Planı ile sağlanmalıdır. Uygulama bir sonraki denetim esnasında doğrulanacaktır. Eğer belirtilen terminden itibaren hiçbir düzeltici faaliyet uygulanmazsa, major uygunsuzluk uygulanacaktır (MN2 ye bakınız).</i>
MN2	= Major Minor deviation from the Regulation. A written notification of noncompliance is imposed. Evidence of corrective actions must be provided prior to certification. If no corrective actions are implemented by the deadline indicated, a proposed suspension of certification will be imposed./ <i>Yönetmelikten major uygunsuzluk. Uygunsuzluğun yazılı bildirimi uygulanır. Düzeltici faaliyetlerin kanıtları sertifikasyon öncesi sağlanmalıdır. Eğer belirtilen terminden itibaren hiçbir düzeltici faaliyet uygulanmazsa, sertifikasyonun askıya alınma önerisi uygulanacaktır.</i>

Annex I: Certification status per plot

Ek I: Her arazi için Sertifikasyon statüsü

cc: Program Manager NOP/ USDA / Inspector

Bilgi: NOP Program Yöneticisi NOP/USDA/Kontrolör

Possibility of rebuttal according to NOP (USDA) in case of a Notification of Noncompliance

Uygunsuzluk bildirimi durumunda NOP (USDA)'a göre reddedilme ihtimali

If a certified operation believes the *notification of noncompliance* is incorrect or not well-founded, the certified operation may submit a rebuttal to bio.inspecta AG, as applicable, providing supporting data to refute the facts stated in the notification. The opportunity for rebuttal is provided to allow certifying agents and certified operations to informally resolve noncompliance issues. The rebuttal process should be helpful in resolving differences which may be the result of misinterpretation of requirements, misunderstandings, or incomplete information.

Sertifikalı bir operator uygunsuzluk bildiriminin yanlış olduğu ya da bir temele dayandırılmadığını düşünür ise bio.inspecta AG'ye, uygulanabilir olduğunda, bildirimde belirtilen gerçekleri reddetmek için destekleyici verileri sağlayan, itirazını sunabilir. Ret fırsatı, sertifikasyon kuruluşu ve operatöre uygunsuzluk durumlarının gayri resmi olarak çözümlenmesine izin verme amacıyla verilmektedir. Ret süreci, gereksinimlerin yanlış yorumlanması, yanlış anlaşılmalara ya da eksik bilgiden kaynaklanan farklılıkların çözümlenmesinde yardımcı olmalıdır.

Alternatively, the certified operation may correct the identified noncompliance and submit proof of such corrections. When the certified operation demonstrates that each noncompliance has been corrected or otherwise resolved, the certifying agent will send the certified operation a written *notification of noncompliance resolution*. *Alternatif olarak, sertifikalı operator tanımlanan uygunsuzluğu düzeltebilir ve bu düzeltmelerin bir kanıtını sunabilir. Sertifikalı operator her bir uygunsuzluğun kapatıldığını ya da farklı biçimde çözümlendiğini gösterdiğinde, sertifikasyon kuruluşu sertifikalı operatöre yazılı bir uygunsuzluk çözüm bildirimi gönderecektir.*

bio.inspecta AG

Ackerstrasse
CH-5070 Frick
Tel. +41 (0) 62 865 63 00

Avenue d'Ouchy 66, Case postale
CH-1001 Lausanne
Tél. +41 (0) 21 601 69 34

admin@bio-inspecta.ch
www.bio-inspecta.ch

WBT Tarım Ürünleri San. Tic.
A.Ş - Burdur
O.S.B 2.cad. No: 10
Antalya
TÜRKİYE

bi N°: TR-088.001 BURDUR

30.11.2016/ ST

NOP Notification of noncompliance resolution
NOP uygunsuzluk çözüm bildirimi

Dear Sir or Madam,
Sayın ilgili,

On the basis of the submitted documents we have verified that the submitted measures are adequate to resolve the NOP noncompliances. We are pleased to inform you that our committee has agreed to resolve complaint regarding the previously announced noncompliances. In the frame of the next inspection we will verify whether the measures are implemented and your farm/company complies with the NOP requirements.

Sunulan dokümanlara dayanarak, NOP uygunsuzluklarının çözümü için sunulan önlemlerin yeterli olduğunu doğrularız. Komitemizin daha önce bildirilen uygunsuzluk ile ilgili şikayetin çözülmesi için karara vardığını memnuniyetle bildiririz. Bir sonraki kontrolde çiftliğinizin/firmanızın NOP gerekleri ile uygunluğu ve alınan önlemlerin yerine getirilip getirilmediği doğrulanacaktır.

Previously announced NOP noncompliance
Daha önce bildirilen NOP uygunsuzluğu:

Relevant section of the NOP Regulation <i>NOP Yönetmeliğinin ilgili bölümü</i>	Facts upon which the notification of non-compliance is based <i>Uygunsuzluk bildiriminin dayandırıldığı olgular</i>	Dead-line <i>Termin</i>	Type of sanction <i>Yaptırım</i>	Evaluation <i>Değerlendirme</i>
§ 205.103	<p>116-BTE: 1 ve 2 nolu araziler 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Plot no:1 and 2 were certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>111-BTE: 5 nolu arazi 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Plot no:5 was certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>114-BTE: Üretici 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında denetlendiğine dair herhangi bir belge sunulamamıştır./ Farmer was certified by Etko within WBT-Burdur project, in 2015. Any document that shows whether the farmer's certification in 2015 was not presented.</p> <p>112-BTE: Üretici 2015 yılında WBT-Burdur projesi kapsamında Etko tarafından denetlenmiştir. Üreticinin 2015 yılında 1,2 ve 3 nolu arazileri için denetlendiğine dair herhangi bir belge sunulamamıştır./ Farmer was certified by Etko within WBT-Burdur project, in 2015. Any document that shows plot nu: 1,2 and 3 whether the farmer's certification in 2015 was not presented.</p>	4 hafta/ 4 weeks	MN2	completed
§ 205.103	<p>Aşağıdaki üreticilerin arazi planlarının bir örneği sunulamadı./ It is not seen field plans of the following farmers.</p> <p>116-BTE</p>	4 hafta/ 4 weeks	MN2	completed

	113-BTE 111-BTE 115-BTE 112-BTE 114-BTE			
§ 205.103	116-BTE: Musa GENCER'e ait bakım sözleşmesi görülemedi./ Keeper's contract has not seen belongs to Musa GENCER.	4 hafta/ 4 weeks	MN2	completed

We are looking forward to further collaborating with you.
Gelecekte sizlerle işbirliği yapmak dileğiyle.

Kind regards,
Saygılarımızla,

bio.inspecta AG

SEVGİ TÜRKÖZ



cc: Program Manager NOP, USDA, Inspector
Bilgi: NOP Program Yöneticisi, USDA, Kontrolör

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		Date	15.07.2015
		Rev	00
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2158D-01 SUSITAS

Dear Madam / Sir: **Umit CAKMAK**

Date: **27.07.2016**

On the dates (**21.07.2016**) ETKO Inspector Mr./ Mrs (**Fatih AKSOY**) 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 NOPACAAdverseActions@ams.usda.gov

	Notification of Noncompliance 2158D-01 SUSITAS	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>(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;</p> <p>(4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;</p> <p>(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</p> <p>(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.</p> <p>(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: <i>Provided</i>, That, the submitted plan meets all the requirements of this subpart.</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201.a.5, 205.103.b.2	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.272.a	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.3	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.272.b.2 205.103.b.2	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>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.</p> <p>- 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 Jungbunzlauer branded citric acid whereas in the conventional production 1 sack of RZBC branded citric acid used were seen but, they couldn't be found on the inventory card.)</p>				
Inspection criteria	NOP reg. ref	205.103.b.2, 205.103.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.		Date		
Review Date				Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§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:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>§205.271 Facility pest management practice standard.</p> <p>(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:</p> <p>(1) Removal of pest habitat, food sources, and breeding areas;</p> <p>(2) Prevention of access to handling facilities; and</p> <p>(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.</p> <p>(b) Pests may be controlled through:</p> <p>(1) Mechanical or physical controls including but not limited to traps, light, or sound; or</p> <p>(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.</p> <p>(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.</p> <p>(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: <i>Provided</i>, 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.</p> <p>(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.</p> <p>(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: <i>Provided</i>, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>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, "Profesyonel Çevre Sağlığı Ltd. Şti." 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.</p>				
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		

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Signature of Appl. Resp.			
Review Date			Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment: Reviewer name & signature:			

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		Rev	00
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2325F-01 EFAL

Dear Madam / Sir: **Aytekın METE**

Date: **01.08.2016**

On the dates (**19.07.2016**) ETKO Inspector Mr./ Mrs (**Fatih AKSOY**) 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 NOPACAAdverseActions@ams.usda.gov

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2325F-01 EFAL

Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance:</p> <p>205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.103.a.b.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

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2325F-01 EFAL

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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>205.202 Land requirements.</p> <p>Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206;</p> <p>(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</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.202.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **14.10.2016**

On the dates **04.08.2016** ETKO Inspector **Mr. Artem Chernysh** realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

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

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
OZ140004	Soybean Plants	3080F-01 Rinagro	Field No 2	Pyraclostrobin	0,064	None	0,01	Noncompliance

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

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

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

Sincerely

Enclosure: Inspection report number:

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

Non-compliances:

	Notification of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 10
		Date	15.07.2015
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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
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Subject of nonconformity	Analyses	Std or reg. Art. nr. NOP 205.105	NCR No 2016.1
Inspection Date	04.08.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
<input checked="" type="checkbox"/> Major S2. 7.4		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input checked="" type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§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:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues:</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report.</p> <p>Sample of soya plants was taken in the middle of the field Nr2.</p> <p>Distance from source of contamination was approximately 150 meters. source of contamination was found – a small conventional garden next to the field Nr2.</p>					
Inspector Name and signature	Mustafa Akyüz	Operator name and signature	Igor Okunenko		
Corrective Action Plan by Operator					
Target date	14.11.2016	Operator name and signature	Igor Okunenko	Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES	NO	Date	ETKO approval	
Explanations					

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: **Alexey Khachkovskiy**

Date: **17.10.2016**

On the dates (**07.10.2016**) ETKO Inspector Mr. (**Fatih AKSOY**) realized a **surveillance inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

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

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

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

Failure to resolve the outstanding non-compliances will result in

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

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

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

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

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

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

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	07.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
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)					
Inspector Name and signature		Fatih AKSOY	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	

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/3

Explanations

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

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

Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	07.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
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: - 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		Fatih AKSOY	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:					

	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: [Alexey Kachkovskiy](#) Date: **17.10.2016**

On the dates (**07.10.2016**) ETKO Inspector Mr. ([Artem Chernysh](#)) 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 NOPACAAverseActions@ams.usda.gov

	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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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	12.10.2016	Due Date	12.11.2016
<input type="checkbox"/> Majör		<input checked="" type="checkbox"/> Minör	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>Issue: A5.3 Registration form of complaints and register are presented but there is no complaint procedure</p>					
Inspector Name and signature	Artem Chernysh	Operator name and signature	Alexey Kachkovskiy		
Corrective Action Plan by Operator					
Target date	12.11.2016	Operator name and signature	Alexey Kachkovskiy	Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/3

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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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
<input type="checkbox"/> Majör		<input checked="" type="checkbox"/> Minör	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>Issue: A2.4 Instructions for transport companies about transportation organic goods are not in place</p>			
Inspector Name and signature	Artem Chernysh	Operator name and signature	Alexey Kachkovskiy
Corrective Action Plan by Operator			
Target date	12.11.2016	Operator name and signature	Alexey Kachkovskiy
		Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations:			

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/4

Dear Madam / Sir: **Vyacheslav Belov**

Date: **17.10.2016**

On the dates (**06.09.2016**) ETKO Inspector Mr. (**Mustafa Akyüz**) 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 NOPACAAverseActions@ams.usda.gov

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/4

Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-9.6	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issues: - Lot nr is not mentioned with B/L and Invoice. - Status of product is not mentioned with B/L</p>					
Inspector Name and signature		Mustafa Akyüz		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 <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations					

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/4

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input checked="" type="checkbox"/> Major M2-9.2		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input checked="" type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(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:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) 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.</p> <p>Issues: - Label approved after the export, so product transported to US without label</p>					
Inspector Name and signature	Mustafa Akyüz	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 <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	4/4

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Prohibited substances	Std or reg. Art. nr. IACB	NCR No 2016.3
Inspection Date	06.10.2016	5.3b,c, 7.2.4a, NOP 205.105.a	
Date of Notification	14.10.2016	Due Date	14.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-8.11	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.</p> <p>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:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues: - TLR Results show 87 substances and NOP 2611.1 Prohibited substances indicates 191 substances so there is big gap of chemicals screened. 104</p>					
Inspector Name and signature	Mustafa Akyüz	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 <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/4

Dear Madam / Sir: [Iliin Dmitriy Ivanovich](#)

Date: **30.08.2016**

On the dates (**22.08.2016**) ETKO Inspector Mr. ([Artem Chernysh](#)) 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

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Non-compliances:

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 <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-01.2016.ac
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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
Inspection Date	22.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> 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	Artem Chernysh	Operator name and signature	Iliin Dmitriy Ivanovich	
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	Iliin Dmitriy Ivanovich	Actual Completion date
Verification of Operator's corrective action and implementation by ETKO				
Accepted:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations				

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/4

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 <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>		Report no 3216F-01.2016.ac

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	Due Date	30.09.2016
<input checked="" type="checkbox"/> Major		<input type="checkbox"/> Minor	
<input checked="" type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector				
<p>§205.201 Organic production and handling system plan.</p> <p>(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</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issue: Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records..</p> <p>Issue: Evidence of payment for the rent to the land owners, as they receive products from Helianthus management not provided.</p>				
Inspector Name and signature	Artem Chernysh	Operator name and signature	Iliin Dmitriy Ivanovich	
Corrective Action Plan by Operator				
<p>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.</p> <p>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</p>				
Target date	30.09.2016	Operator name and signature	Iliin Dmitriy Ivanovich	Actual Completion date
Verification of Operator's corrective action and implementation by ETKO				
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations				

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
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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 <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>		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
Inspection Date	22.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> 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		Artem Chernysh	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	Operator name and signature		Iliin Dmitriy Ivanovich	Actual Completion date
Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input type="checkbox"/> NO <input type="checkbox"/>		Date		ETKO approval	
Explanations					

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: [Zadorozhniy Vitaliy Mikhaylovich](#)

Date: **30.08.2016**

On the dates (**23.08.2016**) ETKO Inspector Mr. ([Artem Chernysh](#)) 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

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/4

Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-03.2016.ac
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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
Inspection Date	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(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.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials</p> <p>Issue: Crop rotation is not include leguminous crops, green manure or other crops.</p>					
Inspector Name and signature		Artem Chernysh		Operator name and signature	
				Zadorozhniy Vitaliy 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 Mikhaylovich	Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input type="checkbox"/> NO <input type="checkbox"/>		Date		ETKO approval	
Explanations					

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
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Operator unit no.	3216F-03	Unit name	Zhytnitsa
Location - Address	1-A, Tsentralna str., Karpivka vill., Shyrokiivskiy distr., Dnipropetrovsk reg., Ukraine 53742		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>		Report no 3216F-03.2016.ac

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	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input checked="" type="checkbox"/> Major		<input type="checkbox"/> Minor	
<input checked="" type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(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</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issue: Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records..</p> <p>Issue: Evidence of payment for the rent to the land owners, as they receive products from Zhytnitsa management not provided.</p>			
Inspector Name and signature	Artem Chernysh	Operator name and signature	Zadorozhnyi Vitaliy Mikhaylovich
Corrective Action Plan by Operator			
<p>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.</p>			
Target date	30.09.2016	Operator name and signature	Zadorozhnyi Vitaliy Mikhaylovich
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/> NO <input type="checkbox"/>	Date	ETKO approval	
Explanations			

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	4/4

Operator unit no.	3216F-03	Unit name	Zhytnitsa
Location - Address	1-A, Tsentralna str., Karpivka vill., Shyrokiy distr., Dnipropetrovsk reg., Ukraine 53742		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>		Report no 3216F-03.2016.ac

Subject of nonconformity	Risk of contamination (M2)	Std or reg. Art. nr. NOP, IACB 4.2a, COR 1.2b	NCR No 2016.3
Inspection Date	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> 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		Artem Chernysh	Operator name and signature		Zadorozhniy Vitaliy Mikhaylovich
Corrective Action Plan by Operator					
We will prepare and provide plan of the biodiversity in the farm.					
Target date	30.09.2016	Operator name and signature		Zadorozhniy Vitaliy Mikhaylovich	Actual Completion date
Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input type="checkbox"/> NO <input type="checkbox"/>		Date		ETKO approval	
Explanations					

	Notification of Noncompliance 1216F-04 Volyn Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: Shum Pavlo M. Kolajovych

Date: 01.06.2016

On the dates (12-13.05.2016) ETKO Inspector Mr. (Artem Chernysh) realized a initial inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated 12-13.05.2016 ETKO determined the outstanding noncompliances in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than 01.07.2016 (in 30 days, starting from the date of this notification)

ETKO

100 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to M. Mustafa A-YUZ from ETKO +90-232-3397606 or by email at:

ma@etko.org info@etko.org


Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAS_vendor@norganic.usda.gov

	Notification of Noncompliance 3216F-04 Volyn Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Noncompliances:

Noncompliance No	1	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	12-13.05.2016
Date of Notification	01.06.2016		Due Date	01.07.2016
<p>§205.204 Seeds and planting stock practice standard.</p> <p>(a) The producer must use organically grown seeds, annual seedlings, and planting stock: <i>Except, That,</i></p> <p>(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: <i>Except, That,</i> organically produced seed must be used for the production of edible sprouts;</p> <p>There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	834-Article 9, IACB 5.9
<p>Action taken</p> <p>Suppliers of seeds declared that their seeds are not GMO (see vendor declarations).</p>				
<p>Please identify the supporting documents, if any: 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed</p>				
Name, Surname and Signature of Appl. Resp.	Shum Pavlo Mykolajovich 		Date	05.06.2016
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

	Notification of Noncompliance 3220F-01 AgroDIS	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: [Suslova Lina Ivanivna](#) Date: **17.11.2016**

On the dates (**09.09.2016**) ETKO Inspector Mr. ([Artem Chernysh](#)) 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 NOPACAAdverseActions@ams.usda.gov

	Notification of Noncompliance 3220F-01 AgroDIS	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-01	Unit name	AgroDIS
Location - Adres	v.Kohovka, Ananievskiy district, Odessa region Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. 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
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Issues: - Organic fertilizers and plant protectors were not assessed by ETKO before application</p> <p>- Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO.</p>			
Inspector Name and signature	Artem Chernysh	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 <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-02 SVITANOK Stari Mayaky	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: [Oliyarchuk Ivan Ivanovich](#)

Date: [17.11.2016](#)

On the dates ([10.09.2016](#)) ETKO Inspector Mr. ([Artem Chernysh](#)) 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 Mayaki	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-02	Unit name	SVITANOK Stari Mayaki
Location - Adres	v.Stari Mayaki, Shiryayevskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-02.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	10.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Issues: - Organic fertilizers and plant protectors were applied without ETKO approval.</p> <p>- Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO.</p>			
Inspector Name and signature	Artem Chernysh	Operator name and signature	Oliyarchuk Ivan Ivanovich
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	Oliyarchuk Ivan Ivanovich
Actual Completion date			

Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-03 TOV AGROFIRMA MARYANIVSKA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Gamarc Vladimir Nikolaevich** Date: **17.11.2016**

On the dates (**09.09.2016**) ETKO Inspector Mr. (**Artem Chernysh**) 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 NOPACAAdverseActions@ams.usda.gov

	Notification of Noncompliance 3220F-03 TOV AGROFIRMA MARYANIVSKA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-03	Unit name	TOV AGROFIRMA MARYANIVSKA
Location - Adres	v.Maryanivka, Shyryaivskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-03.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. 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
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Issues: - Organic fertilizers were not assessed by ETKO before application.</p> <p>- Plant protectors were not assessed by ETKO before application.</p> <p>- Seeds were not approved by ETKO before sowing.</p>			
Inspector Name and signature	Artem Chernysh	Operator name and signature	Gamarc Vladimir Nikolaevich
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	Gamarc Vladimir Nikolaevich
		Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-04 Rodina	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: [Salamaha Vasiliy Dmitrievich](#) Date: **17.11.2016**

On the dates (**08.09.2016**) ETKO Inspector Mr. ([Artem Chernysh](#)) realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **08.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

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

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

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

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3220F-04 Rodina	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

Operator unit no.	3220F-04	Unit name	Rodina
Location - Adres	v.Plahteivka, Saratskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-04.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	08.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector	
<p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Issues: - Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO</p> <p>- Organic fertilizers and plant protectors were not assessed by ETKO before application.</p>	

Inspector Name and signature	Artem Chernysh	Operator name and signature	Salamaha Vasiliy Dmitrievich
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Corrective Action Plan by Operator			
Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.			
Target date	17.12.2016	Operator name and signature	Salamaha Vasiliy Dmitrievich
		Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-04 Rodina	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/3

Operator unit no.	3220F-04	Unit name	Rodina
Location - Adres	v.Plahteivka, Saratskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-04.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.272a	NCR No 2016.2
Inspection Date	08.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-5.12	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>Issues: - Crops are not marked in the storages. Storages are not marked as organic.</p>			
Inspector Name and signature	Artem Chernysh	Operator name and signature	Salamaha Vasily Dmitrievich
Corrective Action Plan by Operator			
Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.			
Target date	17.12.2016	Operator name and signature	Salamaha Vasily Dmitrievich
		Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations:			

Ref Nr: 20160729

Date: July 29, 2016

Subject: Minor Issues

Süleyman bey

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

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

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

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

6.5	Toprak iyileştirme ve koruma planınız var mı ve tatmin edici mi? LÜTFEN TOPRAK İYİLEŞTİRME VE KORUMA PLANINIZI AÇIKLAYINIZ.	Toprağın iyileştirilmesi ve korunması adına yürütülen işlemler şunlardır: Toprak iyileştirme konusunda dökümanite edilmiş bir prosedür, talimat bulunmuyor.
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Issue 1: 6.5 Toprağın patojen, ağır metal ve kimyasal bulaşma kaynaklarından korunması ve toprağın iyileştirilmesi konusunda dökümanite edilmiş bir prosedür, talimat bulunmuyor. There is no procedure how to protect the soil, improve organic matter and to avoid contamination from residues, pathogenic organisms, heavy metals.

NOP Requirement **§205.661 Investigation of certified operations.**

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

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

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

18.1	205.103(b)(4), 205.201(a)(1-6)	Organik yönetmeliklere uyumla ilgili şikâyetleri belgelendirmek ve değerlendirmek için prosedürleriniz var mı? LÜTFEN ŞİKAYET PROSEDÜRÜNÜZÜ AÇIKLAYINIZ.	Üreticinin şikâyetlerle ilgili bir prosedürü yok, dolayısıyla alınan ve takip edilen bir şikâyet olmamış. Söz konusu olabilecek ürünlerin nasıl ele alınacağı konusu açık değil.
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Fatih Aksoy

	Notification of Noncompliance	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

2044F-01 Arif Gürdal

Dear Madam / Sir: **Arif Gürdal**

Date: **29.07.2016**

On the dates **20.07.2016** ETKO Inspector **Mr. Mustafa AKYÜZ** 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	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2
2044F-01 Arif Grdal			

Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	20.07.2016
Date of Notification	29.07.2016		Due Date	29.08.2016
<p>Noncompliance :</p> <p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(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.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.</p> <p>(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:</p> <p>(1) Raw animal manure, which must be composted unless it is:</p> <p>(i) Applied to land used for a crop not intended for human consumption;</p> <p>(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</p> <p>(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;</p> <p>(2) Composted plant and animal materials produced through a process that:</p> <p>(i) Established an initial C:N ratio of between 25:1 and 40:1; and</p> <p>(ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or</p> <p>(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.</p> <p>(3) Uncomposted plant materials.</p> <p>4.1 Kompostlama teknięi uygun ancak C:N oranı, sıcaklık ve aktarma konusunda kayıt sistemi geliştirilmemiř.</p> <p>Composting techniques appropriate but there is no recording of C:N ratio, heat and turning</p>				
Inspection criteria	NOP reg. ref	205.203c2	ETKO rules ref.	
Action taken:				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Arif Grdal		Date	27.07.2016
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3080F-01 Rin Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **26.09.2016**

On the dates **04.08.2016** ETKO Inspector **Mr. Artem Chernysh** realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

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

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
2016-20361	Sunflower Plants	3080F-01 Rinagro	Field No 4,5	Chlormequat	0,023	None	0.01	Noncompliance
2016-20360	Soybean Plants	3080F-01 Rinagro	Field No 2	Chlormequat	0,139	None	0,01	Noncompliance

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

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

Failure to resolve the outstanding non-compliances will result in

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

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

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

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

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3080F-02 Diana	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Ferens Vasiliy Ivanovich**

Date: **26.09.2016**

On the dates **05.08.2016** ETKO Inspector **Mr. Artem Chernysh** realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

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

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
51610020	Barley seeds	3080F-02 Diana	Field No 3	Chlorpyrifos	0,04	None	0.01	Noncompliance

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

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

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

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3080F-02 Diana	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Noncompliances:

Noncompliance No	15.6	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	04.08.2016
Date of Notification	26.09.2016		Due Date	26.10.2016
<p>Noncompliance :</p> <p>§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:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues:</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report.</p>				
Inspection criteria	NOP reg. ref	205.105 (a,e)	ETKO rules ref.	5.9
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ferens Vasiliy Ivanovich		Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/8

Dear Sir: **Shin Dongyeop**

Date: **30.06.2016**

On the dates (**11.04.2016**) ETKO Inspector Mr. (**Seo Youngdae**) 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

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Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(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</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5) 205.272(a)	ETKO rules ref.	205.201(a)(5) 205.272(a)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201.(a)	ETKO rules ref.	205.201.(a)
<p>Action taken</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	16.3	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(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.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.</p> <p>(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:</p> <p>The water analysis report and chlorine concentration aren't indicated.</p>				
Inspection criteria	NOP reg. ref	205.203 (c)(3)	ETKO rules ref.	205.203 (c)(3)
<p>Action taken</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.206 Crop pest, weed, and disease management practice standard.</p> <p>(a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to:</p> <p>(1) Crop rotation and soil and crop nutrient management practices, as provided for in §§205.203 and 205.205;</p> <p>(2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and</p> <p>(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.</p> <p>(d) Disease problems may be controlled through:</p> <p>(1) Management practices which suppress the spread of disease organisms; or</p> <p>(2) Application of nonsynthetic biological, botanical, or mineral inputs.</p> <p>Pest, weed, and disease management program aren't attached.</p> <p>More details of neem oil aren't attached such as products specification, organic certificate, manufacturing process, product brochure etc.</p> <p>Disease management procedures haven't been indicated by the producer.</p>				
Inspection criteria	NOP reg. ref	205.206 (a) 205.206 (d)	ETKO rules ref.	205.206 (a) 205.206 (d)
<p>Action taken</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
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Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>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:</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	205.202 (c)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

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Noncompliance No	16.6	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Farm Production Report is not taken and not attached yet.</p>				
Inspection criteria	NOP reg. ref	205.201 (a)(2)	ETKO rules ref.	205.201 (a)(2)
<p>Action taken</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	16.7	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(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</p> <p>Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5)	ETKO rules ref.	205.201(a)(5)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

	Notification of Resolution of Noncompliance 2044F-01 Arif Gürdal	Nr	GP 18 F 11
		Date	15.07.2015
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Dear Madam / Sir: **Arif Gürdal**

Date: **01.09.2016**

On the date **20.07.2016** ETKO Inspector **Mr.Mustafa AKYÜZ** 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 : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance:

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

- Outstanding noncompliance : **None**
NC number(s) :

	Notification of Resolution of Noncompliance 2044F-01 Arif Gürdal	Nr	GP 18 F 11
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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	20.07.2016
Date of Notification	12.08.2016		Due Date	12.09.2016
<p>Noncompliance :</p> <p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(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.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.</p> <p>(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:</p> <p>(1) Raw animal manure, which must be composted unless it is:</p> <p>(i) Applied to land used for a crop not intended for human consumption;</p> <p>(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</p> <p>(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;</p> <p>(2) Composted plant and animal materials produced through a process that:</p> <p>(i) Established an initial C:N ratio of between 25:1 and 40:1; and</p> <p>(ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or</p> <p>(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.</p> <p>(3) Uncomposted plant materials.</p> <p>4.1 Composting techniques are appropriate but there is no record system for C:N ratio, temperature and mixing the compost.</p>				
Inspection criteria	NOP reg. ref	205.203(c)(2)	ETKO rules ref.	205.203(c)(2)
<p>Action taken: The record systems regarding C:N ratio, temperature and mixing are developed as indicated in Annex-1 with a declaration.</p> <p>Please identify the supporting documents, if any: Annex-1 Record System of Composting</p>				
Name, Surname and Signature of Appl. Resp.	Arif Gürdal		Date	
Review Date	11.08.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>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.</p>				
<p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: **Umit CAKMAK**

Date: **30.08.2016**

On the date **(21.07.2016)** ETKO Inspector **Mr. Fatih AKSOY** 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 : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **5**

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

- Outstanding noncompliance : **None**
NC number(s) :

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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>(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;</p> <p>(4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;</p> <p>(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</p> <p>(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.</p> <p>(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: <i>Provided</i>, That, the submitted plan meets all the requirements of this subpart.</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201.a.5, 205.103.b.2	ETKO rules ref.	
<p>Action taken</p> <p>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.</p> <p>Please identify the supporting documents, if any: The photos of raw materials at Çiğli facility at the attachment.</p>				
Name, Surname and Signature of Appl. Resp.	Umit ÇAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment:</p> <p>All organic raw materials have been transferred to Çiğli facility and the related evidences are provided. (See annex resolution NC 1)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.272.a	ETKO rules ref.	
<p>Action taken</p> <p>Labels of conventional caper barrels have been started to be used on the barrels again.</p> <p>Please identify the supporting documents, if any: The photos of conventional caper barrels .</p>				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment:</p> <p>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)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.3	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.272.b.2 205.103.b.2	ETKO rules ref.	
<p>Action taken</p> <p>Records are attached.</p>				
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 ÇAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Evidence of cleaning records was provided. (See annex resolution NC 3)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>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.</p> <p>- 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 Jungbunzlauer branded citric acid whereas in the conventional production 1 sack of RZBC branded citric acid used were seen but, they couldn't be found on the inventory card.)</p>				
Inspection criteria	NOP reg. ref	205.103.b.2, 205.103.c	ETKO rules ref.	
<p>Action taken</p> <p>See the attached list for organic conventional caper inventory records and the stock records for using inputs and input invoices.</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Organic conventional caper inventory records were provided.</p> <p>The stock records for using inputs and input invoices were provided.</p> <p>(See annex resolution NC 4)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§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:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>§205.271 Facility pest management practice standard.</p> <p>(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:</p> <p>(1) Removal of pest habitat, food sources, and breeding areas;</p> <p>(2) Prevention of access to handling facilities; and</p> <p>(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.</p> <p>(b) Pests may be controlled through:</p> <p>(1) Mechanical or physical controls including but not limited to traps, light, or sound; or</p> <p>(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.</p> <p>(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.</p> <p>(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: <i>Provided</i>, 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.</p> <p>(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.</p> <p>(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: <i>Provided</i>, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>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, “Profesyonel Çevre Sağlığı Ltd. Şti.” 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.</p>				
Inspection criteria	NOP reg. ref	205.105.a.b, 205.271.e	ETKO rules ref.	
<p>Action taken</p> <p>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.</p> <p>Please identify the supporting documents, if any: The fixed pest control report</p>				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016

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Review Date	30.08.2016	Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
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 inexactly. (See annex resolution NC 5) Reviewer name & signature: Mustafa AKYÜZ			

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Dear Madam / Sir: **Aytekın METE**

Date: **30.08.2016**

On the date **(19.07.2016)** ETKO Inspector **Mr. Fatih AKSOY** 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 : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **2**

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

- Outstanding noncompliance : **None**
- NC number(s) :

	Notification of Resolution of Noncompliance 2325F-01 EFAL	Nr	GP 18 F 11
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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance:</p> <p>205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.103.a.b.c	ETKO rules ref.	
<p>Action taken</p> <p>See attachment for harvest and selling records.</p>				
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 <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment:</p> <p>Harvest and selling records were provided to ETKO, (see annex NC 1)</p>				
<p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>205.202 Land requirements.</p> <p>Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206;</p> <p>(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</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.202.c	ETKO rules ref.	
<p>Action taken</p> <p>See attached maps</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Aytekin METE		Date	29.08.2016
Review Date	29.08.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment:</p> <p>Mentioned parcels maps were provided to ETKO. Buffer zones are indicated on maps. (See annex NC 2)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Dear Madam / Sir: **Roman Vysochin**

Date: **06.06.2016**

On the date **07.12.2015** ETKO Inspector **Mr. Artem Chernysh** 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 : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **1**
NC number(s) : **15.1**
- Outstanding noncompliance : **None**
NC number(s) :

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Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(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:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) 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.</p> <p>(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: <i>Provided</i>, That, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: <i>Provided further</i>, 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.</p> <p>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.</p> <p>B2.2: There is no indication on the storages</p> <p>B2.5: No labels are used for bulk products.</p>				
Inspection criteria	NOP reg. ref	205.307a	ETKO rules ref.	834-Article 19, 23, IACB 7.4, 9.1 889-Article 35, IACB 7.5.4 OCP A8.1, B.2.2 and 2.5
<p>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.</p> <p>Please identify the supporting documents, if any: Annex 1; storage pictures. In case organic trading.</p>				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>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.</p> <p>Reviewer name & signature: Mustafa Akyüz</p>				

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Dear Madam / Sir: **Roman Vysochin**

Date: **06.06.2016**

On the date **07.12.2015** ETKO Inspector **Mr. Artem Chernysh** 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 : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **5**
NC number(s) : **15.1, 2, 3, 4, 5 See below**
- Outstanding noncompliance : **None**
NC number(s) :

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Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>They have no records about cleaning of storages and trucks.</p>				
Inspection criteria	NOP reg. ref	205.272 (a),	ETKO rules ref.	889-Article 31 IACB 7.5.2 OCP 11.4, 15.1 and 2:
<p>Action taken Records of storage and trucks cleaning are presented.</p> <p>Please identify the supporting documents, if any: Annexes of records</p>				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>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.</p> <p>Reviewer name & signature: Mustafa Akyüz</p>				

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Noncompliance No	2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	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.

Inspection criteria	NOP reg. ref	205.307 (a)	ETKO rules ref.	889-Article 35 IACB 7.5.4
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Action taken **Labels are prepared. Storages are indicated as organic (see pictures). Crops are sold as conventional but sample of label is prepared.**

Please identify the supporting documents, if any: **Annex 1. Storage Pictures.**

Name, Surname and Signature of Appl. Resp.	Roman Vysochin	Date	30.04.2016
Review Date	02.06.2016	Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>

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

Reviewer name & signature: **Mustafa Akyüz**

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Noncompliance No	3	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(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</p> <p>There is no enough description about buffer zones and farm neighbors. Buffer zones on the fields map are not clearly indicated.</p>				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	6.5.3 - 834-Article 12.1,
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	02.06.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Maps were updated and provided to ETKO Annex 2. Evaluation of BZ is done and indications made on the map.</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>205.403 (c) Verification of information. The on-site inspection of an operation must verify:</p> <p>(1) The operation's compliance or capability to comply with the Act and the regulations in this part;</p> <p>(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;</p> <p>(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.</p> <p>There are no records about trainings personal in organic farming and NOP regulation was not present in the farm.</p>				
Inspection criteria	NOP reg. ref	205.403c1	ETKO rules ref.	889-Article 31 IACB 7.5.2
<p>Action taken NOP regulations were downloaded from USDA AMS webpage. Trainings were done and registers are prepared.</p>				
<p>Please identify the supporting documents, if any: Annexes</p>				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>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.</p> <p>Reviewer name & signature: Mustafa Akyüz</p>				

	Notification of Resolution of Noncompliance 3130D-01 AGROS	Nr	GP 18 F 11
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Noncompliance No	5	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
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
- (5) **Seeds, annual seedlings, and planting stock treated with prohibited substances may be used to produce an organic crop when the application of the materials is a requirement of Federal or State phytosanitary regulations.**
- (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
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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 <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>

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

Reviewer name & signature: **Mustafa Akyüz**

	Notification of Resolution of Noncompliance 3216F-01 Helliatus LLC	Nr	GP 18 F 11
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Dear Madam / Sir: **Ilin Ivan Alekseevich**

Date: **23.06.2016**

On the date **(11.12.2015)** ETKO Inspector **Mr. Artem Chernysh** 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: **3**

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

- Outstanding noncompliance : **None**
- NC number(s) :

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Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 There is risks of contamination. There is a lot of dust in storage N1 were store corn (300t). Also there is red color stain. Director says that stain made 3 years ago and will be cleaned. They have no records about storage cleaning.</p>				
Inspection criteria	NOP reg. ref	205.272a	ETKO rules ref.	834-Article 12.1 IACB 6.5.3, 11.1
Action taken : Storages were swept, stains were cleaned. Storage cleansing register was unimplemented.				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	11.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: Storage cleaning register is presented. (last cleaning is done 25.04.2016 by Prooms.) Reviewer name & signature: Fatih Aksoy				

	Notification of Resolution of Noncompliance 3216F-01 Helliatus LLC	Nr	GP 18 F 11
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Noncompliance No	2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;.</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
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
<p>Action taken : All sections of the Annex were finished.</p> <p>Please identify the supporting documents, if any: OCP Annex Farm Production Report</p>				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	07.04.2016
Review Date	30.04.2016			<p>Resolved <input checked="" type="checkbox"/></p> <p>Unresolved <input type="checkbox"/></p>
<p>Review Comment: Confirmed. See Annex.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	3	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§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.</p> <p>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.</p>				
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 : The field map was redrawn with the indication of the neighbors and buffer zones.				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	04.04.2016
Review Date	30.04.2016			Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
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				

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Noncompliance No	4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§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;</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	834-Article 12.1, IACB 6.5.3, 14.1-14.3 OCP
<p>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.</p>				
<p>Please identify the supporting documents, if any: Prop. Material Approval Form, Letter about seeds</p>				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	07.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Letters, forms and certificates, invoices are presented. See annexes. Corn was sold as conventional.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: **Struk Victor Ivanovych**

Date: **23.06.2016**

On the date **(11.12.2015)** ETKO Inspector **Mr. Artem Chernysh** 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: **5**

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

- Outstanding noncompliance : **None**
- NC number(s) :

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Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>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.</p> <p>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.</p>				
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 <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
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				

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Noncompliance No	2	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§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;</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
Inspection criteria	NOP reg. ref	§205.103	ETKO rules ref.	IACB 10.2
<p>Action taken : OCP Annex Section "Summary All Farms" was filled in and completed.</p> <p>Please identify the supporting documents, if any: 3216F-02 2015 June OP 01 F 28 Farm Production Report Client.20150525</p>				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	06.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Confirmed. Form is filled.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	3	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	IACB 6.5.3
<p>Action taken : The field map was redrawn with the indication of the neighbors and buffer zones.</p> <p>Please identify the supporting documents, if any: 3216F-02 Dovira - Map with BZ indication</p>				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	07.04.2016
Review Date	30.04.2016			Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
<p>Review Comment: The map with indication of neighbors and buffer zones is presented. See annex.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§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;</p> <p>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</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	IACB 6.4.1, 6.4.2
<p>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.</p> <p>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</p>				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	05.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Seeds certificates, invoices and, propagation material approval form were presented. Risky GMO product as corn was sold as conventional.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: [Zadorozhniy Vitaliy Mikhailovich](#)

Date: **23.06.2016**

On the date **(10.12.2015)** ETKO Inspector **Mr. Artem Chernysh** 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: **6**

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

- Outstanding noncompliance : **None**
- NC number(s) :

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Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.272	ETKO rules ref.	IACB 6.5.3, 11.1
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 <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
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				

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Noncompliance No	2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(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:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) 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.</p> <p>(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.</p> <p>There are no labels on the storages and stored crops are not marked.</p>				
Inspection criteria	NOP reg. ref	§205.307(a)	ETKO rules ref.	IACB 7.5.4
<p>Action taken : Storage and crops marking labels are implemented. Procedure of crops marking is made.</p> <p>Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction for storage personnel, 3216F-03 Zhytnitsa - Storages 1-7</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Labels are prepared and approved by ETKO. Storages are marked by labels. See pictures and annexes.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	3	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;.</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
Inspection criteria	NOP reg. ref	§205.103	ETKO rules ref.	IACB 10.2
Action taken : OCP Annex Farm Production Report was completed.				
Please identify the supporting documents, if any: 3216F-03 2015 June OP 01 F 28 Farm Production Report Client.20150525				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: Annex Farm Production Report is presented and all sections are filled. See annexes. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(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.</p> <p>(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:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(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.</p> <p>11.3-11.4 OCP They have no instructions and procedures to keep integrity of organic products against any contamination risks.</p>				
Inspection criteria	NOP reg. ref	§205.272	ETKO rules ref.	IACB 6.5.3, 11.3 OCP, 11.4 OCP
<p>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.</p> <p>Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction of organic farming, 3216F-03 Zhytnitsa - Instruction for storage personnel</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: - instructions about organic growing, storing are in place</p> <p>- trainings of responsible were done,</p> <p>- storages are marked and clean (cleanings are registered)See annex.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	5	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	IACB 6.5.3, 14.1-14.3 OCP
<p>Action taken : The map of farm fields with the description of neighbors and buffer zones is present.</p> <p>Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Map with indicated BZ</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	14.04.2016
Review Date	30.04.2016			Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
<p>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.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	6	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§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;</p> <p>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</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	IACB 6.4.1, 6.4.2
<p>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.</p>				
<p>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</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	14.04.2016
Review Date	30.04.2016			Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
<p>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.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: **Shum Pavlo Mykolajovych**

Date: **18.08.2016**

On the date **(12-13.05.2016)** ETKO Inspector **Mr. Artem Chernysh** 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) :

	Notification of Resolution of Noncompliance 3216F-04 VolynAgro	Nr	GP 18 F 11
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Resolved Noncompliances:

Noncompliance No	1	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	12-13.05.2016
Date of Notification	01.06.2016		Due Date	01.07.2016
<p>Noncompliance :</p> <p>§205.204 Seeds and planting stock practice standard.</p> <p>(a) The producer must use organically grown seeds, annual seedlings, and planting stock: <i>Except</i>, That,</p> <p>(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: <i>Except</i>, That, organically produced seed must be used for the production of edible sprouts;</p> <p>There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	834-Article 9, IACB 5.9
<p>Action taken : Suppliers of seeds declared that their seeds are not GMO (see vendor declarations).</p> <p>Please identify the supporting documents, if any: 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed</p>				
Name, Surname and Signature of Appl. Resp.	Shum Pavlo Mykolajovych		Date	05.06.2016
Review Date	18.08.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Vendor Declarations for corn and rapeseed are attached. Suppliers of seeds declared that their seeds are not GMO.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: **Shin Dongyeop**

Date: **12.07.2016**

On the date **(11.04.2016)** ETKO Inspector **Mr. Seo Youngdae** 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:

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) :

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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§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</p> <p>§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.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5) 205.272(a)	ETKO rules ref.	205.201(a)(5) 205.272(a)
<p>Action taken: The major source of contamination is regarded as water and it is monitored periodically. Protecting measures of contamination are attached.</p> <p>Please identify the supporting documents, if any: Annex 1,2 and 18, 19, 24- Protecting measures of contamination</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop 		Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: The required documents are provided and they are proper. Protecting measures of contamination are attached.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				


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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>(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;</p> <p>(4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;</p> <p>(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</p> <p>(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.</p> <p>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.</p>				
Inspection criteria	NOP reg. ref	205.201.(a)	ETKO rules ref.	205.201.(a)
<p>Action taken: Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided.</p> <p>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</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop 		Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				


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Noncompliance No	16.3	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(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.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.</p> <p>(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:</p> <p>The water analysis report and chlorine concentration aren't indicated.</p>				
Inspection criteria	NOP reg. ref	205.203 (c)(3)	ETKO rules ref.	205.203 (c)(3)
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			Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment: Water report is provided. Reviewer name & signature: Fatih Aksoy				


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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.206 Crop pest, weed, and disease management practice standard.</p> <p>(a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to:</p> <p>(1) Crop rotation and soil and crop nutrient management practices, as provided for in §§205.203 and 205.205;</p> <p>(2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and</p> <p>(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.</p> <p>(d) Disease problems may be controlled through:</p> <p>(1) Management practices which suppress the spread of disease organisms; or</p> <p>(2) Application of nonsynthetic biological, botanical, or mineral inputs.</p> <p>Pest, weed, and disease management program aren't attached.</p> <p>More details of neem oil aren't attached such as products specification, organic certificate, manufacturing process, product brochure etc.</p> <p>Disease management procedures haven't been indicated by the producer.</p>				
Inspection criteria	NOP reg. ref	205.206 (a) 205.206 (d)	ETKO rules ref.	205.206 (a) 205.206 (d)
<p>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.</p> <p>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</p>				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop 		Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>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.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				


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Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.202 Land requirements.</p> <p>Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206;</p> <p>(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</p> <p>(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.</p> <p>There is no indication regarding the condition of neighboring farm as like conventional, organic and crop type in the attached map.</p> <p>In the attached map field boundaries are defined. But there is no scale and specific address.</p> <p>The neighbors farming type, paths width and scales of map have not been pointed out by the producer.</p>				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	205.202 (c)
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		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: Detailed map of showing the circumstances are attached. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.6	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(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;</p> <p>Farm Production Report is not taken and not attached yet.</p>				
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				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop 		Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: 'Farm production report' is attached.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	16.7	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(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:</p> <p>(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</p> <p>Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5)	ETKO rules ref.	205.201(a)(5)
Action taken : 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 <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: The Declaration regarding this issue is provided. Reviewer name & signature: Fatih Aksoy				

SUSİTAŞ SU ÜRÜNLERİ VE
SAN. MAMÜL İHR. TİC. A.Ş.
İAOSB 10040 Sok. No: 25
Çiğli – İZMİR
TURKEY



Vorderhaslach Nr. 1
91230 Happurg
Germany

11.10.2016

Notice of NC for your organic operation

Dear Ümit Çakmak,

This Notice of Noncompliance is based on findings from:

Inspection conducted by:	Ümit Cevik
On:	25.08.2015
To the following operation(s):	Wild collection and processing
Affecting the following part(s) of the operation:	Wild collection and processing of caper
Under the following organic standard(s):	Reg. (EC) 234/2007, NOP
Products requested for certification:	Caper
Restrictions for certification:	none

Please find details of the noncompliances in the attached Excel sheet, including reference to the respective standard(s). Please submit your corrective actions according to the timelines indicated in this Excel sheet, using Column **E** (yellow) for explaining your corrective actions, and submitting the respective documentation / evidence along with your explanations.

Please note that a certificate can only be issued once adequate corrective actions have been received.

A copy of this letter will be sent to the NOP Adverse Actions Department.

Thank you very much for your co-operation!

Best regards,

Saba Kum, CERES GmbH