

## **Trade and Warehousing**

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The certification procedure for organic production is regulated by the norms for the respective standard.

**For EU-certification in Third Countries:** Reg. EU 2018/848 + delegated and implementing acts  
**For the USA:** the NOP Final Rule – NOP/COR Equivalence  
**For Japan:** the organic JAS

For the certification of labeling, trading and storing organic products, specifically, the following rules will be considered by Kiwa BCS, in line with the above-mentioned norms:

### **For EU-certification in Third Countries:**

Reg. (EU) 2018/848 as applicable to the articles mentioned in chapters II, III, IV, especially Art. 30 -33, Annex III, Annex IV; Reg. (EU) 2021/2306 Art. 3; Reg. (EU) 2021/1698 Art. 16. Reg. (EU) 2021/771 Art. 1

**NOP, Organic JAS laws and COR** do not regulate trade and warehousing of organic products and do not request certification for such activities. Condition is that the organic goods are not re-packed, re-labeled or otherwise manipulated in any way by the trader.

The inspection program is structured as follows:

- a) Organic Systems Plan
- b) Inspection
- c) Certification

### **1. Organic Systems Plan**

The Organic Systems Plan is to be compiled by the operation and submitted to Kiwa BCS for verification before the inspection. This description has to be updated continuously to reflect the current state of the operation. Changes always have to be communicated to the certification body, but no later than before an upcoming inspection.

An Organic Systems Plan template is provided by Kiwa BCS. It consists of the following elements:

- Conformity Declaration of the operation
- Complete description of the operation and its facilities
- Description of all procedures respective the handling of the products, so Kiwa BCS can verify their compliance with the respective standard.

In case the operator is interested in being certified under Reg. (EU) 2018/848, it is mandatory to provide a preventive measure plan mentioned in Reg. (EU) 2021/1698 Art. 10, 1. a) iii.

On the other side, under NOP a Fraud Prevention Plan is mandatory to be provided in this stage.

### **2. Inspection of Importers, Exporters, Distributors and Warehouses**

During inspection the compliance of the operation/part of the operation with the requirements of the respective standard is verified. An announced inspection takes place at least once per year. Further announced and/or unannounced inspections can be part of the certification procedure. The inspector is obliged and authorized to request and verify all documents, records and amenities as deemed necessary for the inspection.

#### **2.1. Organic Systems Plan**

In general, the inspection is based on the verification of statements in the Organic Systems Plan and on comparison with the findings on site. If needed, adjustments have to be made to the Organic Systems Plan.

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### **2.2. On-Site Inspection**

- The on-site inspection encompasses all parts of the operation (as applicable)
- Offices, products delivery area, warehouse, commissioning, shipping area
- Documentation and records in all areas of the operation

Subject to inspection are all production procedures and – facilities of the operation, as well as all concrete measures regarding a compliance of the standard regarding:

- Separation (space / time) of products regarding the EU Bio-Regulation from products in all areas of the operation including the points of interface with delivery and customers
- Storage Protection, Cleaning
- Use of ionizing irradiation
- Sealing and identification of raw goods and half and fully processed goods (e.g. shipper, Importer/Distributor, organic identification/organic status, product title, if applicable lot numbers)
- Delivery logs for all goods/ items etc. (product name, type, quantity, quality, organic/conventional, if applicable item number), documentation with name and signature of the person in charge
- Warehouse bookkeeping
- Information regarding separation in space and time of products
- Information regarding cleaning procedures (cleaning of rooms and facility)
- Shipping Logs (type, quantity, buyer, if applicable item number)
- Information regarding traceability (delivery of products, lot numbers and item numbers)
- Precautionary measures in place to avoid risks of contamination of organic production and products with non-authorized products or substances

### **2.3. Verification of Documents**

The following documents are to be present at time of inspection and made available to the inspector:

- Purchasing
- Product Delivery information (verification of delivery of goods and documentation, supplier and/or seller, type and quantity of the received raw materials/additives/ processing aids/materials, specifications, contracts, shipping documents, certificates)
- Warehouse Administration (warehouse bookkeeping, storage, flow of volume)
- Shipping/sales (type and identification of products, quantities of products, identification in shipping documents, buyer/recipient/customers, all documentation of sales, use of certificates)
- Product reclamations, information procedure for buyer/customers in the case of irregularities, procedure of stoppage of goods
- Measures for traceability
- Commodities management, accounting, bookkeeping, if applicable, banking slips/bookings
- Warehouse documentation/ - records
- Storage protection, cleaning (applied substances, products)
- Flow of goods (quantity calculations)

### **2.4. Inspection report**

- The inspection report is the final document and states the results of the inspection. It is compiled by the inspector and has to be signed by the operation manager.
- It documents detected non-compliances with the respective standard and determines measures for correction of non-compliances to be implemented by the inspected party.

The results of the inspection report are basis for the certification.

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- Sampling is generally always possible; in moments of suspicion they are mandatory.
- Sampling of packaging and/or labeling materials
- Sampling of other materials

### **3. Certification**

- Certification is based on the inspection report and the Operation Systems Plan
- If needed, conditions are imposed and communicated in written form
- If needed, measures according to the catalogue of measures are imposed and communicated
- Tracking of implementation of conditions by Kiwa BCS
- Certification decision / issuance of certificate

The Inspection Program is a model and not conclusive. Specific situations in the operations can lead to variances from the described program. It serves for orientation during the execution of the certification procedure according to the respective standard by Kiwa BCS Öko-Garantie GmbH. The Inspection Program is subject to modifications.