

**International certification  
(Outside of the EU)**

**Organic Farming**

**CERTISYS system**



## **Who is this guide aimed at?**

This practical guide is aimed at the operators working outside of Europe (EU) who are looking to have their organic products certified to enable them to export their products to the European market. The guide outlines the various steps involved in the organic certification process but does not in any way act to replace applicable regulations. Certisys is also available to shepherd you through the NOP certification process for the US marketplace, Bio Suisse certification, and the certification procedures in place in other countries. Contact us at [info@certisys.eu](mailto:info@certisys.eu) for the steps to be put in place to obtain these other certifications.

## **What is CERTISYS?**

CERTISYS was set up in 1991 by a group of pioneers who felt passionate about planet Earth, engineers and agricultural scientists by occupation, who firmly believed in the need to protect the land and the way it is worked, in order to rise to the challenge of setting up a credible and trustworthy system of organic farming auditing and certification. The auditing system is one of the cornerstones intended to enable the sector to develop on a sound basis, by guaranteeing the authenticity of organically farmed products and preventing fraud.

Certisys has been up and running for over 30 years and works locally in Belgium, Luxembourg and in Africa – as well across a global network - in partnership with a rising number of farmers and businesses operating in the agri-food industry, but equally in other domains that are committed to sustainable development such as fair trade.

Based on values of local presence and involvement, ethical considerations, independence, transparency and fairness, CERTISYS works to develop sustainable farming and to secure sustainable food in a way that is concerned with looking after the interests of people, animals and the planet as a whole. CERTISYS works with all members of the organic sector: operators (producers, processors, distributors, caterers and restaurateurs, retailers and importers), consumers, and the public authorities, in order to develop and promote organic farming on a participatory basis.

CERTISYS ensures the necessary human, material and financial resources are in place to carry out its mission and to accomplish its aims in observance of the values it propounds.

## **At international level?**

To best serve the needs of the projects outside of the EU, a dedicated international team has been set up which exclusively deals with these international projects. The team is made up of agricultural engineers who are based in Burkina Faso and who perform the actual audits, along with coordination staff in Belgium that act as the link to the certification side of things.

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### Other documents available from our website: [www.certisys.eu](http://www.certisys.eu)

- CERTISYS Standard for countries outside of the EU (RX2053 and RX2059)
- Notification of activities (OR3347)
- Organic System Plan
- Group engagements (specimen) (OR3340)
- Annual crop producers' internal auditing questionnaire (specimen) (QT3615)
- Perennial crop producers' internal auditing questionnaire (specimen) (QT3616)

## 1. Taking up organic farming

### 1.1 Introduction

CERTISYS has been officially approved by the European Commission to certify organic farming products outside of the European Union.

The accreditation relates to several countries, as detailed in Council Regulation (EU) no. 1235/2008 appendix IV. The latest version of the country list is available to be consulted at our website at all times.

To conduct our certification activities, we have devised a 'CERTISYS Standard for non-EU countries' (hereinafter referred to as the 'CERTISYS Standard'), which has been approved by the Commission under EU Regulations no 834/2007 and no 889/2008 which apply across Europe. As amendments are brought to relevant EU regulations, the 'CERTISYS Standard' is adapted in line therewith so as to remain on a par and is endorsed on each score for BELAC, our accreditation body. The latest version of the 'CERTISYS Standard' is available to be consulted at our website: [www.certisys.eu](http://www.certisys.eu).

CERTISYS's approval relates to the following product categories: :

- **Category A** : farmed or wild-harvested unprocessed vegetable products
- **Category D** : processed agricultural products and yeasts intended for human consumption

The sale of foodstuffs certified as 'organic' implies that the entire production chain is duly audited, from the farming or wild-harvesting stage of the raw materials all the way up to the export of the products. All relevant regulations, along with the forms to be completed and our rates are available to be consulted online.

### 1.2 Definitions

« **Operator** »: Natural or legal person that produces, prepares, stores, packs or imports organic farming products from third countries with a view to marketing and selling the said products, or that markets and sells these products.

« **Certification** » : The range of actions undertaken by CERTISYS aimed at demonstrating that (a) product(s), as well as the associated production techniques comply with the applicable regulations on organic farming specific to this/these product(s).

Please note: The inspections performed by CERTISYS are to verify the operator's undertaking to observe the rules of organic farming. Subsequent to this inspection, and provided the statutory requirements have been duly met, the operator is issued with the relevant certification documents so as to formalise the compliance of his products and farming methods with organic production methods.

The inspection report only takes the observations made at the time of the audit into consideration, and does not in any way preclude supplementary remarks being put forward as part of subsequent audits conducted in due course.

In the event non-conformities are found to exist, the operators in question may be sent an improvement request by CERTIFYS or even face sanctions, which in some cases go as far as denying them the right to label the products affected as 'organic'.

« **Certificate** » Document delivered in compliance with the rules of a certification system. The certificate specifically bears on products or product groups.

The certificate specifies the products that are compliant with organic production methods according to different categories:

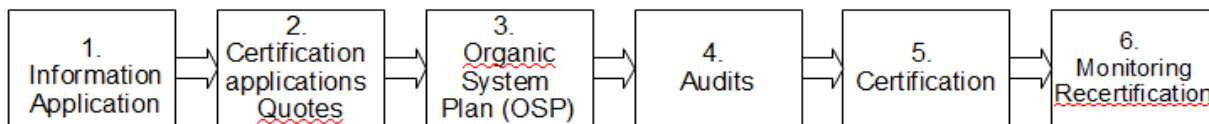
- derived from organic farming ;
- processed products: > 95% of ingredients derived from organic farming (tolerance for 5% of the non-organic ingredients specified in a limited list – appendix IX of Regulation 889/2008);
- processed products: < 95% of ingredients derived from organic farming (only a reference to organic farming in the list of ingredients);

- main product of hunting or fishing, with other ingredients derived from organic farming. The certificate authorises the producer to have his product labels specify the fact that the products concerned are compliant with organic production methods according to these different categories. The certificate is delivered after the inspection and certification and comes with a specific validity duration.

« **Complaints** »: There are two types of complaints:

- **Complaints from third parties addressed to operators** : All complaints informing operators that there is a problem with the conformity of (one of) their products with the requirements of the technical specifications. These complaints are to be recorded in a register that must be made available to CERTISYS as well as the appropriate measures put in place in response to such complaints.
- **Complaints addressed to CERTISYS** : All written complaints or disputes from audited operators or other parties in respect of the way certification issues are dealt with or other questions in connection therewith. The complaints may relate to a certification document, another audited operator, a CERTISYS staff member, etc. All of these complaints are recorded by the Quality manager in a register, along with the measures implemented in response to these complaints.

## 1.3 Certification stages



### 1.3.1 Information and application

The first step in the certification process is concerned with gathering the relevant details. To this end, CERTISYS will send you the following information either by e-mail or make this information available to you in the form of downloads from our website :

- the 'CERTISYS Standard' (latest version),
- this practical guide in hand outlining the certification process,
- the 'Notification of activities' form as well as the contracts,
- the applicable rates – our quotes are prepared setting out from these rates.

To initiate your application, we expect you to return the duly completed and signed 'Notification of activities' form.

### 1.3.2 Certification applications and quotes

Based on the details supplied by you, CERTISYS examines your application and decides whether or not it is admissible. A tailored quote is subsequently prepared in consideration of the applicable rate and a set price scale that is in keeping with the description of your project as supplied by you. This quote is returned to you as soon as possible. CERTISYS' quotes are based on the estimated amount of time required to audit and certify your project. In all cases, our quotes include:

- the collection of at least one sample and the analysis thereof by an accredited laboratory,
- the inspector's accommodation and travel expenses,
- the certification fee including follow-up,
- the certificate preparation fees.

After you have accepted the quote, you are invited to return a duly signed copy of the CERTISYS service agreement. You will be asked to pay a deposit based on the first invoice raised in compliance with the signed quote. An inspector will then get in touch with you to arrange his upcoming visit, which will take in the various production and preparation sites, as well as the storage facilities prior to export.

### **1.3.3 Organic System Plan (OSP)**

We will ask you to describe your production system and the measures put in place to ensure the proper management of your organic production methods by completing the 'Organic System Plan' document. This is a management plan between you and CERTISYS which encapsulates the descriptions of all aspects of the agricultural production or preparatory activities. This plan is drawn up, amended and validated in dialogue between yourself and CERTISYS, and must be adapted to the specifics of each project.

### **1.3.4 Audits**

As part of the audit, our inspectors will prepare a report of the measures implemented to ensure due compliance with the rules of organic production. At the end of the inspection, any non-conformities will be communicated to you. You undertake to put in place the relevant corrective measures within a set deadline.

There are several types of inspection :

- Annual inspections: The project is to be audited at least once every year.
- Supplementary inspections may be conducted if your project should be made to undergo major changes during the course of the year or if we should require crucial additional details.
- In addition, spot checks may be performed based on a risk analysis.

#### What do the inspections entail?

Amongst other things, the checks performed by the CERTISYS inspector include the verification of :

- the conformity of the project description, involving visits to the various production sites, which look at the crop production areas, the origin of the vegetable material, the inputs and crop protocols as well as the administrative records of events and the traceability of the harvests.
- the provenance of the basic raw materials,
- the collection system and storage facilities,
- the measures to ensure appropriate separation between conventional and organic products,
- the revenues and preparation procedures,
- the packaging and labelling materials,
- samples may be taken at any point during the process (anything from soil samples to finished product samples and all intermediary stages in between). The analyses are performed by an accredited laboratory.

### **1.3.5 Certification**

If a favourable opinion is delivered by the certification department further to an in-depth examination of your situation, which takes in all relevant details, your project is duly certified. You are then provided with a certificate which details your organic-certified production output. Your certificate is also made available right away to be consulted at our website: [www.certisys.eu](http://www.certisys.eu).

All exports of certified products to the European Union need to be accompanied by a transaction certificate, which can be requested with consummate ease on the CERTISYS intranet.

### **1.3.6 Monitoring and annual recertification**

Each year, you will be invited to update your 'Notification' and your 'Organic System Plan', whereby you inform us of all changes in the management of your project that occurred during the course of the year. You will then be sent an adapted quote to continue the inspections of your project.

## **1.4 Group certifications**

In order to reduce the cost of the inspections, you are free to operate setting out from an internal auditing system implemented by a group of producers. In that case, CERTISYS inspects the internal auditing procedures in place. The internal auditing consists of technical guidance and support for the producers in the area of organic farming (agricultural education and extension system), the identification of the producers, the land parcels, verification of compliance with the requirements of organic farming. The final chapter of this document has full details of group certifications.

## **1.5 Wild plant gathering**

Wild plants that grow by themselves in natural areas, woodland and on farmland may be marketed and sold carrying the organic hallmark, provided that :

- these areas were not subjected to treatments involving the use of products other than those for which permission was granted allowing them to be used with a view to organic production during a 3-year time span prior to harvesting,
- the harvesting does not affect the stability of the natural habitat or the conservation of the species living in the harvesting area.

## **1.6 Conversion period reduction**

To enable vegetables and vegetable products to be considered as organic, the rules of organic production must be implemented on the designated land parcels during a conversion period of at least two years prior to seeding or, in case of perennial crops other than animal feeds, a period of at least three years prior to the first harvest of organic products.

CERTISYS may decide to recognise with retrospective effect as constituting part of the conversion period, all earlier periods during which:

a) the parcels were subjected to measures set out in a rural development programme or another official programme, provided that these measures ensure that no products that are unauthorised as part of organic production systems were used on the said land parcels; or

b) the parcels were natural or agricultural areas that were not treated with products that are banned in the context of organic production systems.

The time period intended in the first paragraph, item b), may be taken into account with retrospective effect only if the evidence thereof as furnished to CERTISYS is sufficient to enable the latter to satisfy itself that these conditions were duly met during a time period of at least three years.

In order for the conversion period to be recognized retroactively, the operator and the inspector must fill in an application form, listing the parcels and products for which the application is made and providing the justification and documentary evidence allowing the validation of this application by CERTISYS.

This application must be formalized before the sowing or planting of annual crops, at the beginning of the activity period related to perennial crops.

In the case of a new project to be certified organic, the inspector carries out an inspection of the parcels to allow the validation of the application by CERTISYS.

In the case of a project already certified organic, once the application has been sent to the inspector, the latter decides if an inspection of the parcels is necessary in order to complete the supporting elements and allow the validation of the application. In any case, the inspector must have **the possibility** to check the new parcels at the appropriate time, if he wishes.

## 2. Certification system

CERTISYS has devised a list of harmonised sanctions for all audited operators that work in observance of organic production methods. This list comprises a total of nine sanctions, ranging from a simple remark to total suspension (see next page).

These stepped sanctions are adapted to suit all non-conformity situations and enable :

- matters to be specified in the way the situations encountered are described,
- the certification manager to impose the most appropriate sanction.

The list of sanctions distinguishes between various non-conformity situations :

- with implications for the use of the product's 'organic farming' designation: if this permission is taken away, the product is no longer considered as an organic farming product, which means the product is downgraded;
- with no direct implications for the product's organic status but requiring corrective measures within a set time span.

The sanctions are imposed on a gradual basis in response to successive findings of non-conformities. Each finding attracts the matching sanction in consideration of the operator's previous record of non-compliance.

Provided the first finding of a non-conformity is redressed by the operator within the time span set by CERTISYS, and no similar non-conformities are found within 24 months after the first finding, this finding is no longer taken into account as a 'repeat offence' for the application of staggered sanctions.

### List of sanctions

#### Remark:

**SR**

#### **Simple remark**

The simple remark is used for irregularities or minor shortcomings.

#### Improvement request:

**IR**

#### **Improvement request**

The improvement request details the nature of the irregularity encountered, along with the improvement that is expected and the time span in which this improvement must be put in place.

#### **Improvement request with a written undertaking**

Same scope of application as the improvement request, albeit accompanied by a written undertaking signed by the operator.

#### Caution :

**C**

The caution is accompanied by the specification of the sanction that will be imposed if the operator fails to heed the caution and neglects to remedy the shortcoming found. **All improvement requests that fail to be acted upon within the time span specified in the improvement request result in a caution being issued.**

#### Tightened inspection :

**TI**

Tightened inspections are systematically implemented in all situations where a caution has had to be imposed. This sanction is accompanied by a bill for a flat rate sum to be paid by the operator.



## Suspensions :

**PS**

### **Product suspension :**

The operator is prohibited from selling a given type of product carrying indications that refer to organic production methods for a set period of time.

**TS**

### **Total suspension :**

The operator is prohibited from selling all products carrying indications that refer to organic production methods for a set period of time.

## Downgrades :

Downgrades are conservatory and preventive measures intended to protect the sector, even if this means a loss for the operator which may be perceived as a sanction.

**PD**

### **Parcel downgrade :**

Déclassement du statut d'une parcelle ne permettant plus à celle-ci de produire des cultures « bio » pendant une durée déterminée.

**LD**

### **Lot downgrade :**

Definitive loss of 'organic' status for a specific lot of products.

The decision to suspend the certification may be imposed at any time when a blatant breach is established. This provision does not prejudice the application of article 30.1 §2 of the Council Regulation (EU) no. 834/2007.

The examples provided do not remove CERTISYS's right to put in place all and any sanctions it deems expedient in consideration of the practices encountered.

When an operator switches to a new inspection body, the new inspection body will consider the sanctions implemented by the former inspection body based on the information exchanged between the two bodies.

The aim of the implementation of the list of sanctions and the list of non-conformities is to help the operators move forward in a positive sense towards the appropriate application of the rules, even if sanctions are sometimes necessary to ensure non-compliant products are withdrawn from the market.

## 3. Appeal procedure

Upon receipt of a letter of certification notifying the operator of the decision in respect of a prospective certification, the operator is free to instigate an appeal. Only the operator (natural or legal person) can file the petition for appeal. This appeal may relate to **any certification decisions** by CERTISYS.

In order to be admissible, the petition must be sent to CERTISYS:

- by letter sent by **recorded delivery**;
- within **14 days**: dispatch date of the letter;
- **duly motivated**: setting out new elements which CERTISYS had not been previously apprised of.

If the appeal is found to be admissible, it will be examined with a view to **mediation**: a committee at CERTISYS will

meet and examine the appeal based on the fresh elements put forward by the operator.

The committee is made up of one or several representatives of the Quality, Certification and Inspection Departments. The person(s) who were involved in the inspection that led to the sanction(s) disputed by the operator have no decision-making powers.

At his request, the operator may be heard by CERTISYS. In certain cases, CERTISYS will need to seek the permission from the responsible Authority to change the sanction. If the mediation results in a change of the sanction, CERTISYS will amend the certification documents and provide the operator therewith. The outcome of the mediation is communicated to the operator within 15 days.

## **4. Certification of producers groups**

The CERTISYS Standard sets out the possibility for “producer groups” to be certified. The internal auditing system may be assessed with a view to the certification of “producer groups” if adequate assurances are in place; this may diminish the need for outside on-site inspections of every sub-unit or producer that is part of the association.

### **4.1 Definitions**

« **Preparation** » : This covers all work performed to the products outside of the farm (production site) aimed at storing, cleaning, sorting, packing or processing an unprocessed agricultural product into a finished or semi-finished agri-food product (drying, dehulling, culinary preparation).

« **Production unit** » : This is the location where the products are grown and/or prepared, with the inclusion of all sub-units situated in the local area. A production unit may be made up of several sub-units situated in the same local area, operating under an organic system plan, and managed by an internal auditing system which ensures compliance with the applicable provisions of the various regulations. Each production unit operating as part of an organic production or preparation system defines its own site, practices, management and products.

« **Sub-unit** » : This is the smallest single part of a production unit, such as a field, a parcel of land, a wild harvesting area, or a separate processing sector. For instance, if the village is a production unit, the producer-members of the association in the village are the sub-units.

« **Internal auditing system (ICS)** » : This is the quality assurance system set up in-house, and included as part of the Organic System Plan, which defines the practices, record-keeping and the requirements of the internal auditing that apply to each production unit, site or installation. The ICS specifies the internal auditing method adopted.

### **4.2 Prerequisites for the certification of “producer groups”**

The “producer group”, which is made up of production units, sites, and installations, must be formally organised (as an association, a cooperative, a company, an EIG or Economic Interest Grouping, individual workers, or any other kind of entity).

The certification is made out to the name of the association, not to the individual members, who may present themselves as being certified only through the association.

The practices of the “producer group” must be congruous and attest to a consistent process or methodology, using the same inputs and procedures.

Membership of the certified project of the “producer group” is confined to members who are required to sell their organically certified production output through the association, unless the members are individually certified.

The producers-members of the association must adopt the same procedures and techniques of production, processing, distribution and marketing, without omitting the traceability of their products all the way up to their final destination (logging, labelling, branding, etc.).

The record-keeping and archive protocols must be conformable. It will not be accepted that the production units of the “producer group” use different data recording methods.

### **4.3 “Producer group” projects under the organic system**

The “producer group” is to devise and implement an internal auditing system (ICS) involving internal checks and record-keeping activities of the production practices and of the inputs used in each sub-unit, production unit, site or installation so as to ensure compliance of the products with organic production methods.

#### **Admission criteria for “members” to a production unit:**

All members of a production unit:

- individually undertake to observe organic production methods;
- take the same training classes laid on by the association;
- implement the same production and record-keeping practices;
- the supply of inputs is controlled by the association;
- have the same operational manager, training manager, quality control manager and the same manager in charge of the operation of the internal auditing system;
- adopt conformable and identical preparation processes;
- are situated in the same local area, defined by their access to the same post-harvesting storage or processing installation(s), and/or common land parcels, the same water supply sources, the same structural land and soil features and other physical factors;
- produce the same products and share the same harvesting programme.

### **4.4 Inspection of “producer group”**

The inspection or outside audit performed by CERTISYS is the assessment on the ground of the production or preparation project of a certificate applicant with a view to establishing the latter’s compliance with organic production methods as described in the OSP.

In amongst other things, the annual external inspections are aimed at verifying the conformity of the OSP, the control of the inputs, the storage facilities, the measures to separate conventional and organic products and land parcels, the revenues and preparation procedures, the packaging and labelling materials, and the hygienic measures in respect of the processing operations. The description must be conformable, both for the crop production areas, the origin of the inputs and the crop protocols, and for the administrative records of events and the traceability of the products.

To a large degree, the verification of the OSP is performed by way of an audit of the way the internal auditing system operates, along with a physical investigation of each production unit (usually the registered offices or joint processing or collection services) and the statistically meaningful sample collection at the sub-units in any given production unit. In the “producer group”, the sub-production unit is the smallest unit that is to be audited each year. In addition to the compulsory annual inspection, spot checks may be organised.

### **4.5 Internal auditing system (ICS)**

#### **4.5.1 The role of the ICS**

The internal auditing system was set up to ensure compliance on the ground with the rules of organic production. All members of a “producer group” are governed by the same OSP and the ICS is to ensure appropriate guidance and training to guarantee that all participants take care that the plan is properly implemented in the same uniform manner. It is in the interest of the ICS workers to safeguard the organic status of the association as a whole.

In a given production unit, the local in-house inspectors are tasked with checking the practices of the members (all land

parcels, all sites and all installations) **at least once a year at a minimum**. The inspection of a sub-unit of the “producer group” is to focus on the critical points of the organic farming methods such as neighbouring crops, the condition of the crops, soil quality indicators, inputs, storage facilities and the due understanding of the organic requirements on the part of the producers.

Whereas CERTISYS’ role is to ensure that the ICS functions correctly at the level of the production units, the sites, and the installations, the internal auditing system is to analyse each of these product units, sites or installations in greater depth. All non-conformities detected at the production unit, sites or installations must be reported to CERTISYS (not just fed into the ICS).

#### 4.5.2 How does the ICS work?

The local in-house inspectors are to perform at least one comprehensive annual inspection of every producer, which is to include field visits and/or visits to the installations. The internal auditing system must be used to keep appropriate records of events, including at a minimum a description of the sub-units and the installations, the production plans, the harvested products, the producer contract and the internal inspection reports.

The internal auditing system must be made to include the due application of sanctions on the various members who fail to act in compliance with the association’s OSP. It is to inform the certifying body of the irregularities and non-conformities encountered, however minor. It is also to inform the members concerned of the corrective actions imposed on them, and of the deadlines granted for these actions to be implemented.

The ICS is to set out a list of sanctions to be applied to the association’s members who fail to act in compliance with the organic production methods. It is to arrange for supplementary inspection visits to check the implementation of the relevant corrective actions. It is also to provide for the suspension or the exclusion of members or sub-units who fail to act in compliance, including the corrective measures that must be undertaken by the members or the units before they qualify to be re-admitted. It is to inform the certifying of all corrective actions; a member who wilfully or fraudulently acts in breach of the regulations may not be re-admitted to the group until the certifying body has approved the measures put in place to make sure no such breaches can occur again.

#### 4.5.3 Internal auditing system functions

Functions to be set up within the ICS :

- **Technical committee:** made up of technicians, this committee establishes the crop and agricultural practices to be applied by the producers. It is tasked with the record-keeping of the data and documenting the supply of inputs.
- **In-house assessment committee:** made up of technicians, representatives of the board of directors and of resource persons (liaison officers), this committee sets out from the internal inspection reports to assess the non-compliance of a member and implements the penalties as set out.
- **ICS Manager:** the premier manager of the ICS, who supervises the co-ordination of the activities
- **In-house inspectors:** technical agents tasked with identifying the sub-units, monitoring due observance of the requirements by the project’s sub-units, units, sites and installations; these inspectors are assisted in these endeavours by resource persons (liaison officers) who, by virtue of their presence at the units and sites are able to ensure closer follow-up.
- **Trainer:** a manager tasked with staging training courses and upskilling the workers.

Irrespective of the number of people who work as part of the ICS, the ICS manager is to compile an organisation chart to provide people with a clear understanding of the various duties of everybody involved, and to raise the sense of responsibility of all concerned. It is crucial that ICS staff have a clear understanding of the various roles and responsibilities in respect of resource and training management.

#### 4.5.4 Potential conflicts of interest

The local in-house inspectors may face conflicts of interests with the people close to them and find themselves in

trouble if they need to report non-conformities. This is a reality for projects of individual producers as much as it is for “producer group” projects. In order to confine the potential number of non-conformities that go unreported, the internal auditing system personnel must be given written assurance that they will not be made to suffer any consequences if they detect and report non-conformities. In essence, this written assurance from the association or from the ‘(legal) person’ creates a protective ‘firewall’ for the in-house inspectors. Moreover, it is also incumbent on these workers disclose, in writing and on an annual basis, all potential conflicts of interest ahead of the external inspection.

The ICS staff could be considered as having a conflict of interests inherent to their obligation to make sure the group as a whole retains its organic status. The association can avoid all conflicts of interests by appointing in-house inspectors in regions and villages different from those where the people concerned are originally from. Moving around the inspectors of the different units, sites and installations at regular intervals, is another way for the association to avoid complicity between the personnel and the members. The members of the association are to report all changes that might affect the conformity of the products. This information in respect of the ICS staff is also to be communicated to CERTISYS.

