	<b>Company of Organic Agriculture in Palestine</b>	
	<b>Procedure Name:</b> Audit Services and activities	<b>Procedure No:</b> ASA
	MRQ Sign: Dalal Hussien	Issue Date: 25.2.2019

## I. Objective

Provision of high quality auditing and certification services, through the effective planning and efficient implementation of auditing services, depending on the high-qualified company auditors

## II. Scope


Scope of Auditing and Certification Services includes unprocessed plant products (including wild harvest) and processed agricultural products for use as food (excluding wine), and does not include beekeeping and livestock organic.

## III. Responsibilities

1. **General Manager** is responsible for following up the implementation of this procedure.
2. **Manager of Inspection Department for Organic Farming** is responsible for following up the inspection and auditing services regarding the Organic Farming.
3. Inspector or Auditor is responsible for performing auditing activities for clients
4. **Certification director is responsible for review all audit outputs and approve the issuance of Certifications, Approve other certification activities like withdraw, suspension .... Etc.**

## IV. Processes


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## 1. General provisions

- COAP provides Certifications Services for Products and Training on the Agricultural subjects in general and does not provide any other services.
- All procedures and inspection process which applied for farmer, manufacturer, and marketers.
- If any operator requires an explanations or clarification for a specific certification scheme (standards such as IACB, EU 889, EU 834, or other normative documents),

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the Certification director shall appoint qualified, impartial and technical competence trainers or explainer to train the operator according to these standards either upon operator request or when these standards are updated.

4. COAP shall take samples (5% of its operators as minimum) for testing and analyzing for detecting possible contamination by products not authorized for organic production. However, such analysis shall be carried out where the use of products not authorized for organic production is suspected.
5. When COAP contracting with party that provides services that related to certification activates such LAB. , the general manger shall inform the operators by sending formal document “Adopted certification actioners” ASA-18 by fax, email or during meeting with operators.
6. When COAP need to collect samples for lab, the inspector shall take 3 sealed and labeled samples according to Sampling Guidelines WI-ASA-05; one for operator, one for lab, and the third for COAP, and he shall link between the samples code and lab. Report code as in Sampling report ASA-21.
7. When the inspector sends the lab. sample, he gets sample receiving documents and bill that linked to the sample.
8. When the lab. Report is issued, and then if any party suspect the result, shall inform the rest parties and send the sealed samples to lab.to re-evaluate the results.
9. In case of cooperative, the cooperative has to assign a cooperative presentative as central manager of the farm including all plots, premises, or production units:
  - The central manger has to be authorized by all certified farmers, all processors as in central management agreement ASA-23.
  - Responsibilities of the central manager as in the following but not limited to:
    - 1- Make sure all activities, materials, fertilizers, pesticides, etc. are compliance to organic standards.
    - 2- Make sure all documents needed for organic certification are available, completed, and updated.

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- 3- Communicate with COAP in cases of risk issues that may affect on organic certification.
- 4- Follow up recommendations, non-conformities, and COAP decisions.
- 5- Inform and train the cooperative in case of updating COAP system or updating organic standards.

### 1.1 Unannounced Visit and Additional Visits


1. COAP run number of random Not Announced Visit (Audit) for Operators at Least 10% of total surveillance visits) COAP will run the audit like the surveillance audit see surveillance visit audit clause in this document accordance with its Risk Management RIM procedures.
2. COAP shall perform additional visits audits to at least 10% of its operators in accordance with its Risk Management RIM procedures.

## 2 Application

1. Operator shall include all information related to his/her farms in the application form (ADR-01)
2. Operator with inspectors shall prepare the cultivation plan for his farms including the crops names and cultivation dates using the cultivation plan form (ASA-04), this plan is used as reference for next inspections.
3. Operator shall provide information about it using the application form and shall give the needed commitment using the commitment form according to admission procedure.

### 2.1 Parallel Production

1. In the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, provided the following conditions are met:
  - a. the production in question forms part of a conversion plan in respect of which the producer gives a firm undertaking and which provides for the beginning of

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the conversion of the last part of the area concerned to organic production in the shortest possible period which may not in any event exceed a maximum of five years;


- b. appropriate measures have been taken to ensure the permanent separation of the products obtained from each unit concerned;
- c. the control authority or control body is notified of the harvest of each of the products concerned at least 48 hours in advance;
- d. Upon completion of the harvest, the producer informs the control authority or control body of the exact quantities harvested on the units concerned and of the measures applied to separate the products.

## 2.2 Conversion Period Reduction

1. Operator shall notify COAP for the intention to reduce the time required to convert the land in a written letter from the farm manager,
2. Once the notification is received COAP inspector shall conduct a sample (fruit, soil or oil) test to ensure that the soil is free of chemicals or any products that are not authorized for organic production,
3. The farm manager shall have a valid reason for reducing the conversion period and a Prof of a competent party or governmental authority for conducting organic practices before registration with COAP,
4. After fulfillment of those points the inspector must fill an inspection report and submit it to the certification director to take a decision to accept the written request for conversion period reduction time.

## 2.3 Separation between organic and non-organic

1. Operator shall declare that the same facility includes organic and non-organic products.
2. Declare about the separation procedures which the operator considers.

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3. Allow the inspector to access all records including the non-organic products records, operator shall sign the application form ADR-01 annex which include a statement that he/she allow the inspector to access all records.
4. Such operators are imposed to more inspection than the other operators. COAP shall consider this into the audit plan.

### **3 Application review**

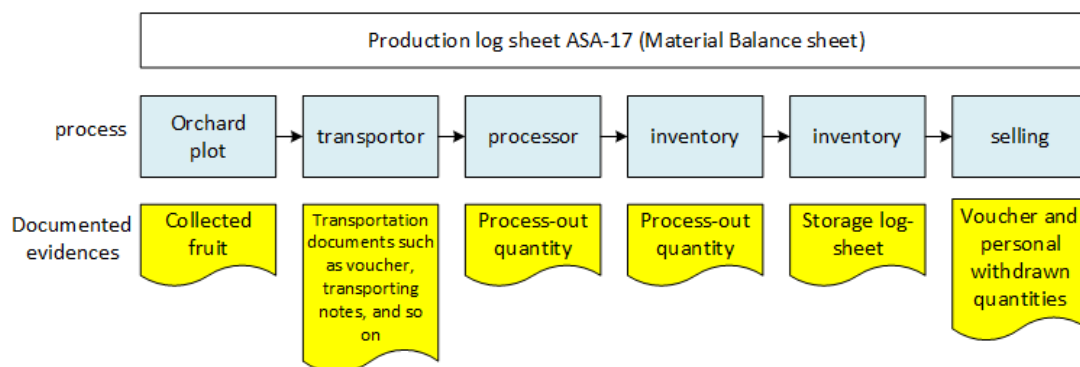
1. After the operator applies to Organic agriculture, the inspector make sure that all required reports according to documents check list ASA-15 are ready before visiting the operator.
2. In case of document loss or unsatisfactory or any issue with the presented documents- the inspector shall notify the operator to fulfill all requirements before the evaluation.
3. Certification director shall review all required documents and audit reports submitted by inspectors using ASA-15 documents check list, and – in case of document loss or unsatisfactory or any issue with the presented documents- the certification director shall notify the inspector to fulfill all requirements before approving and submitting reviewed documents and reports to the certification decision.

### **4 Evaluation**


1. The auditors (evaluators), whenever and where applicable shall use the wild planet report (ASA-03) to report any wild planet and how it affect the farm planet, the report include all needed items and the auditor shall fill all items within the report.
2. The auditors (evaluators), whenever and where applicable shall use ASA-02, ASA-03 or ASA-05 for evaluation of Inspection Report for Organic Farms (Compliance Report), wild plant, and Inspection Report for plant production (Compliance Report) respectively.
3. Auditors/ evaluators shall use the audit check lists according to the needed certification and shall examine the following items but not limited to those items:
  - a. Make sure the operator has a list of approved suppliers.

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- b. The operator shall use the form (ASA-06) to control of its suppliers.
- c. The evaluators sure that operator manage the relationship with subcontractors such as contracts, evaluation of subcontractors, the subcontracting activities, and evaluation if these activates according to organic standards or not , by using ASA-2, ASA-03 or ASA-05.
- d. **Make sure that all subcontractors activities are inspected against organic standards including input materials, fruits, activities, machines or premises; with regardless if the subcontractor is organic certified or not for the same service for the operator such as input material, fruit, activities ,machines or premises , the inspector have to visit the subcontractor and inspect using inspection report.**
- e. Make sure the operator has a list of approved subcontractor with a description of their activities and an indication of the control bodies or authorities to which they are subject.
- f. Make sure the operator and subcontractor have written agreement.
- g. **Make sure all fruit quantities, processed quantities, stored quantities, transported quantities are documented in farm production log sheet ASA-20, all records are supported by vouchers, delivery notes, transportation note, invoice, selling order storage nots and related formal documents as evidence. The production log sheet is considered as traceability method for each plot as shown below.**




- h. Make sure that subcontractor of the operator provide the operators with needed services and materials within the approved specifications and make sure that those specifications and contractors can be traced within the operator quality management system.

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- i. Make sure that all operators subcontracted activities are traceable and operators has control over the quality of those activities within the operators quality system, and make sure that those activities are comply with EU regulation (article 63/a, and article 80).
- j. Make sure where the operator uses licensed or approved fertilizers or seeds or any inputs material or protection material, shall inspect agricultural activities in the farm (Fertilizer or protection material ) "ASA-17" for each plot and keeping the log and all related documents (such as invoice, selling order). COAP inspector shall inspect and evaluate the declared used quantities by the operator and-in case of suspicion-collect soil lab. Samples to evaluate the residual of pesticide and fertilizer
- k. Make sure where the operator does any agricultural activities are documented in agricultural activities in the farm (Fertilizer or protection material) "ASA-17" for each plot and keeping the log and all related documents (such as activities schedule).
- l. The operator shall give COAP the authority to access any information's and documents in all promises which are reasonable with purpose of control.
- m. Make sure that the operators has taken all needed measures to avoid risks of contamination resulted from unauthorized products used in the operators production chain and make sure the risks is minimum and does not affect the organic products production specifications, operators shall have the needed documentations showing that operators take the needed documented steps for this. Inspector shall ensure that the operators steps are valid referring to agricultural good practices, inspector are advised to refer to EU 64 article.
- n. The inspector shall also examine the documentation of the nature of the organic material held in the storage of the farms.
- o. The inspector shall also examine the documentation of the nature, the quantities and the consignees and, where different, the buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities.
- p. In case of cooperative, the inspector shall examine all land parcels and crops of all certified members of the cooperative, and shall examine related documents such as



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farm production log sheet ASA-20, and certified members store their products in certain storage in the cooperative stores and don't put their products in the market individually, then the cooperative sells the certified products.

- q. The inspectors must have access to the fill operators before going to the field and have the full knowledge of status and situation of the farm and took a copy of the fill
- r. in case of operators who do not store or physically handle such organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees in accordance with EU article 66 point 1 E.
- s. The operator documents shall also comprise the results of the verification at reception of organic products and any other information required by the control authority or control body for the purpose of proper control. The data in the accounts shall be documented with appropriate justification documents. The accounts shall demonstrate the balance between the input and the output. Inspector shall examine the existence of such documentations.
- t. Inspector shall examine whether the operator inspect the organic product containers when received from other operators and that the first operator have done also the double check with container labels and documents (all these shall be documented in accordance with operator quality management system).
- u. Check the measures that the operators taking into consideration to separate the organic from non-organic product during the collection process (if such case is existence).
- v. When the operator deals with organic and non-organic products within the same facilities, specified cleaning procedures and activities shall be identified within the operator quality management system, and shall include the needed documentation to ensure that cleaning activities are taking place, and inspector shall examine this within the operator facilities.
- w. Where an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements, operator also shall have needed arrangement with the MRQ to prevent the mistake between the organic and non-


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organic product and if mistake is happen the operator shall identify the needed corrective actions.

- x. Where an operator runs several production units in the same area, the units producing non-organic crops, together with storage premises for farm input products shall also be subject to the general and the specific control requirements, inspector shall document this using the report and with reference to the audit check list.
  - y. The operator when have use any chemicals like ingredients' shall ensure that the use of such ingratiante does not violate the organic character and shall have an approval to use this chemical with organic farms from the Palestinian Ministry of Agriculture stating clearly the used chemical with specified quantities does not affect the organic farming practices and shall be documented in accordance with EU regulations 29.
  - z. Operators shall ensure that organic products are transported to other units, including wholesalers and retailers, only in:
    - o The vehicles and/or containers which have transported nonorganic products are used to transport organic products provided that it is clean and safe.
    - o During transport, the quantity of products at the start and each individual quantity delivered in the course of a delivery round shall be recorded.
4. Important points to be taken into consideration while inspecting farms where livestock production is one of the production, while COAP does not certify organic for Livestock, these points are optional and COAP inspector shall take it into consideration while inspecting any farms that may include livestock facilities
- a. a full description of the livestock buildings, pasturage, open air areas, etc., and, where applicable, the premises for the storage, packaging and processing of livestock, livestock products, raw materials and inputs.
  - b. a full description of the installations for the storage of livestock manure.
  - c. a plan for spreading manure agreed with the control body or authority, together with a full description of the areas given over to crop production

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- d. where appropriate, as regards the spreading of manure, the written arrangements with other holdings as referred to in Article 3(3) of the EU standard complying with the provisions of the organic production rules;
  - e. a management plan for the organic-production livestock unit.
  - f. The following information shall be entered in the register of the apiary with regard to the use of feeding: type of product, dates, quantities and hives where it is used. Inspector shall examine this process if any.
  - g. The zone where the apiary is situated shall be registered together with the identification of the hives. The control body or authority shall be informed of the moving of apiaries by a deadline agreed on with the control authority or body inspector shall examine this also.
  - h. The removals of the supers and the honey extraction operations shall be entered in the register of the apiary.
  - i. Whenever veterinary medicinal products are to be used, the type of product, including the indication of the active pharmacological substance, together with details of the diagnosis, the phonology, the method of administration, the duration of the treatment and the legal withdrawal period shall be recorded clearly and declared to the control body or authority before the products are marketed as organically produced.
  - j. The operator shall identify the potential risks associated with compliance with organic farming in case of livestock for example the risk of compound stuffing inspector shall inspect and search for those risks and shall track the risks management system of the operator, in this case operators shall have risks management system in place.
  - k. During the inspection the inspector shall inspect the internal auditors of the operator competencies to perform the needed audit in terms of educations, training, skills, and other competencies.
5. Operator shall prepare the ASA-10 form annually which includes major information about the farm and crops according the EU 889 standards.

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6. In evaluation, if any nonconformities are discovered, the inspector shall classify as major or minor, according to non-conformities system WI-ASA-03, where:

- Minor nonconformity: a non-conformity that does not affect in granting organic certification directly, and the operator shall solve this non-conformity during suspension period (maximum 6 months), and inspector re-evaluate the condition; if it is resolved, he send the inspection report to certification director to proceed certification., otherwise he send un-resolved nonconformities to certification director to withdraw the certification.
- Major non-conformity: a non-conformity that affect directly in granting organic certification, such as direct impact have over natural product to not consider it as organic, and the operator shall resolve it immediately and implement determined corrective action in inspection report, and inform the inspector, otherwise inspector send the inspection report to certification director to withdraw or not to grand organic certification.

#### 4.1 Miles Monitoring and Control

1. The inspector shall inspect the following:
  - a. Raw material supplier list ASA-06 to be required as part of the inspection.
  - b. Contract with the operator and Mils manager
  - c. Supplied raw material records
  - d. The produced quantity Records
2. The inspector shall compare those records to ensure that the crops of the farm are received and processes by the mills within the same quantities.

#### 4.2 Spilt Production (for organic)

1. When split production occurs, COAP requires additional requirement to make sure of safeguard of that product, COAP requires information regarding the production, processing, storage and sales.



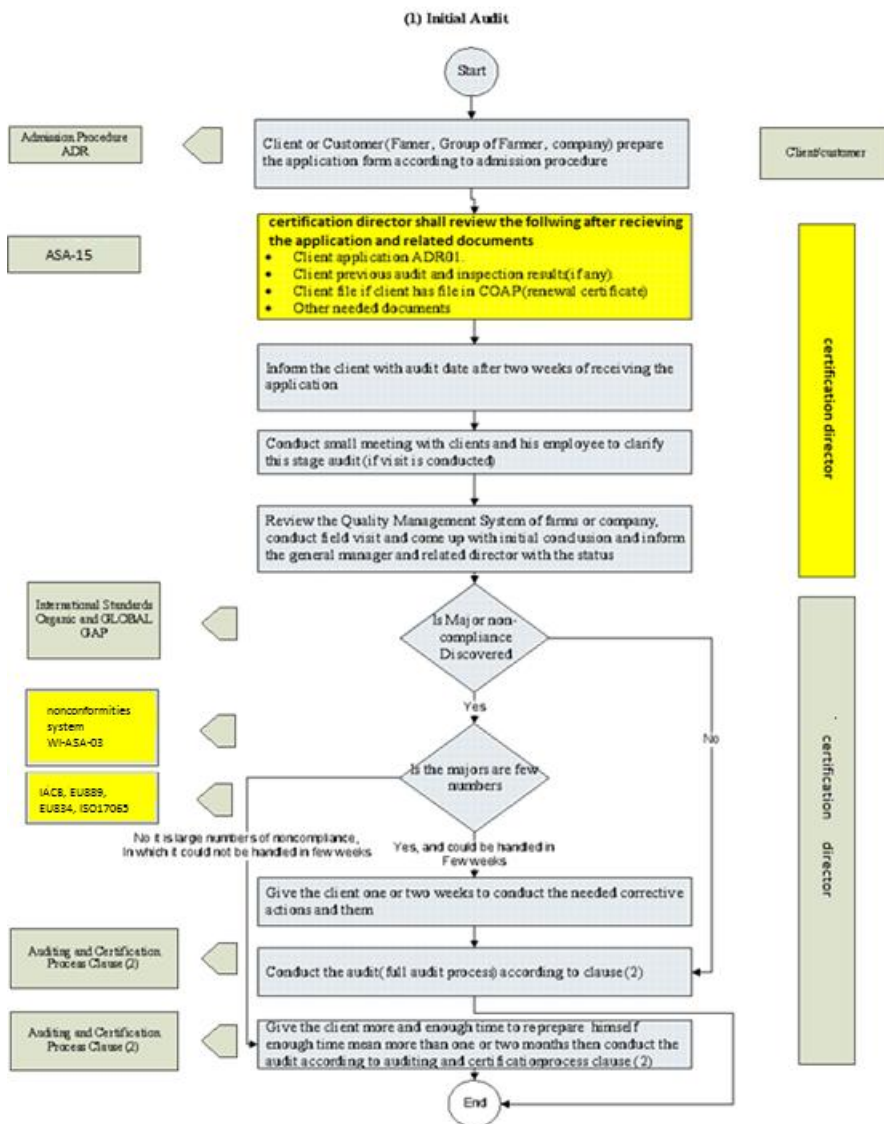
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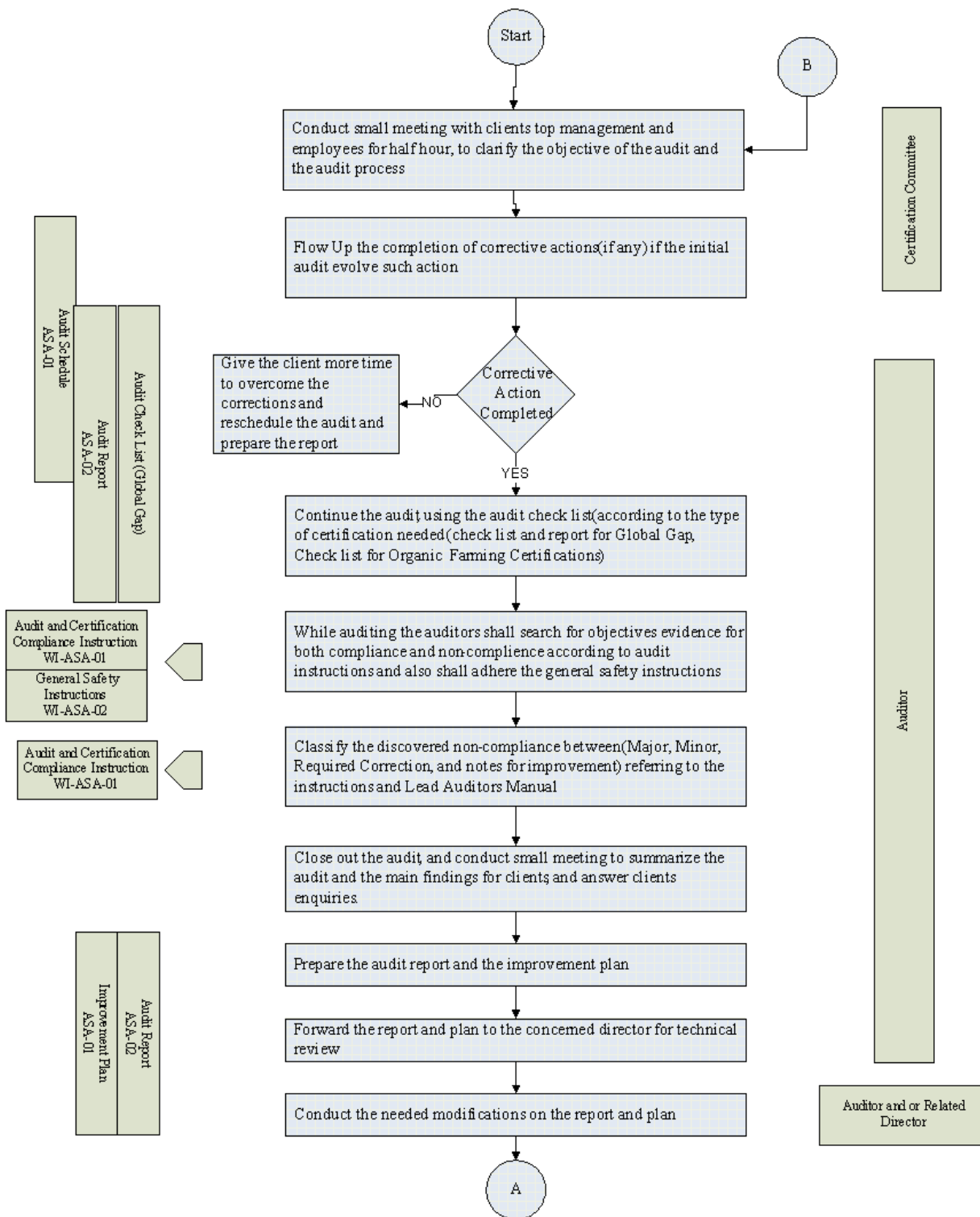
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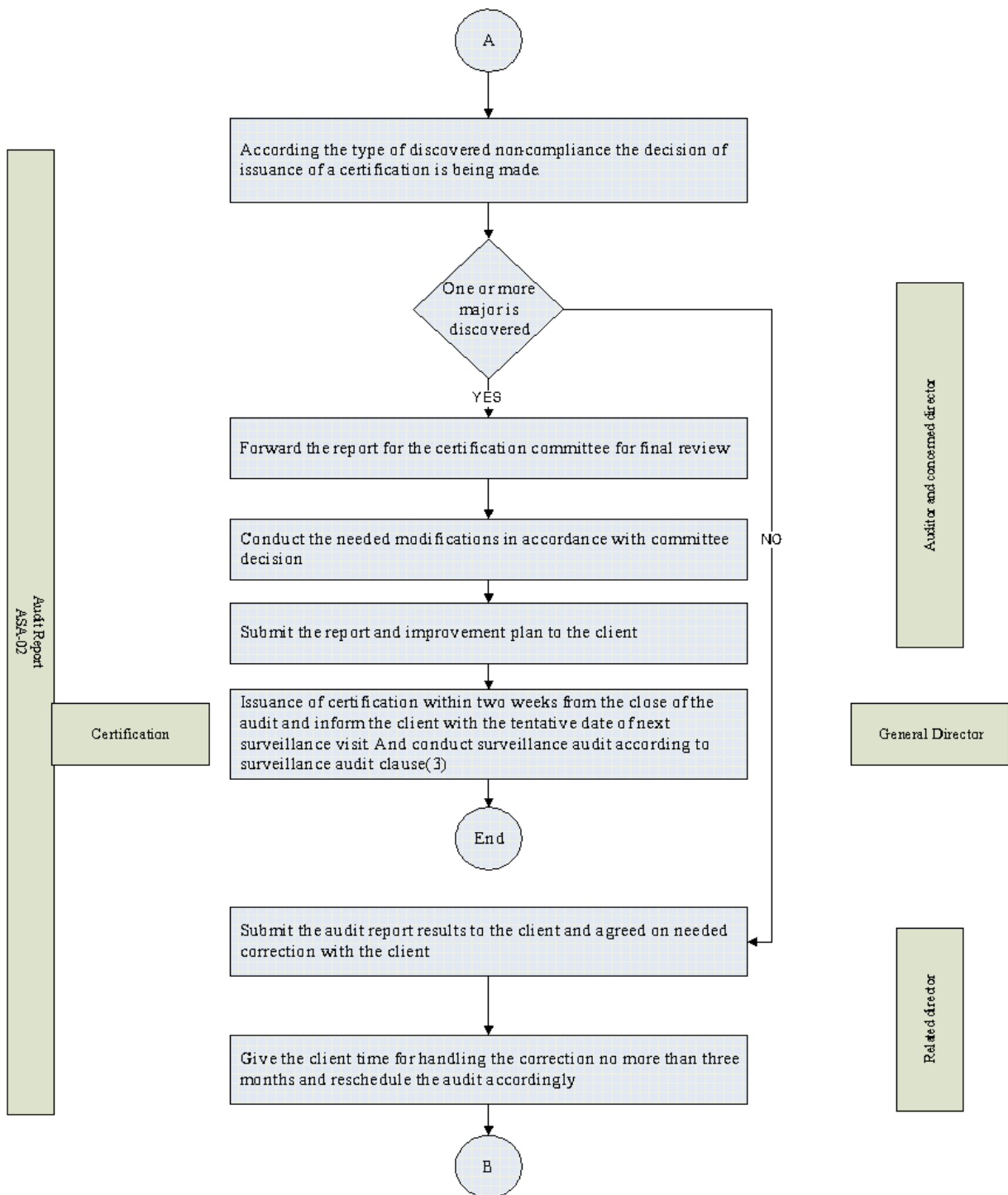
## (2) Auditing and Certification Process



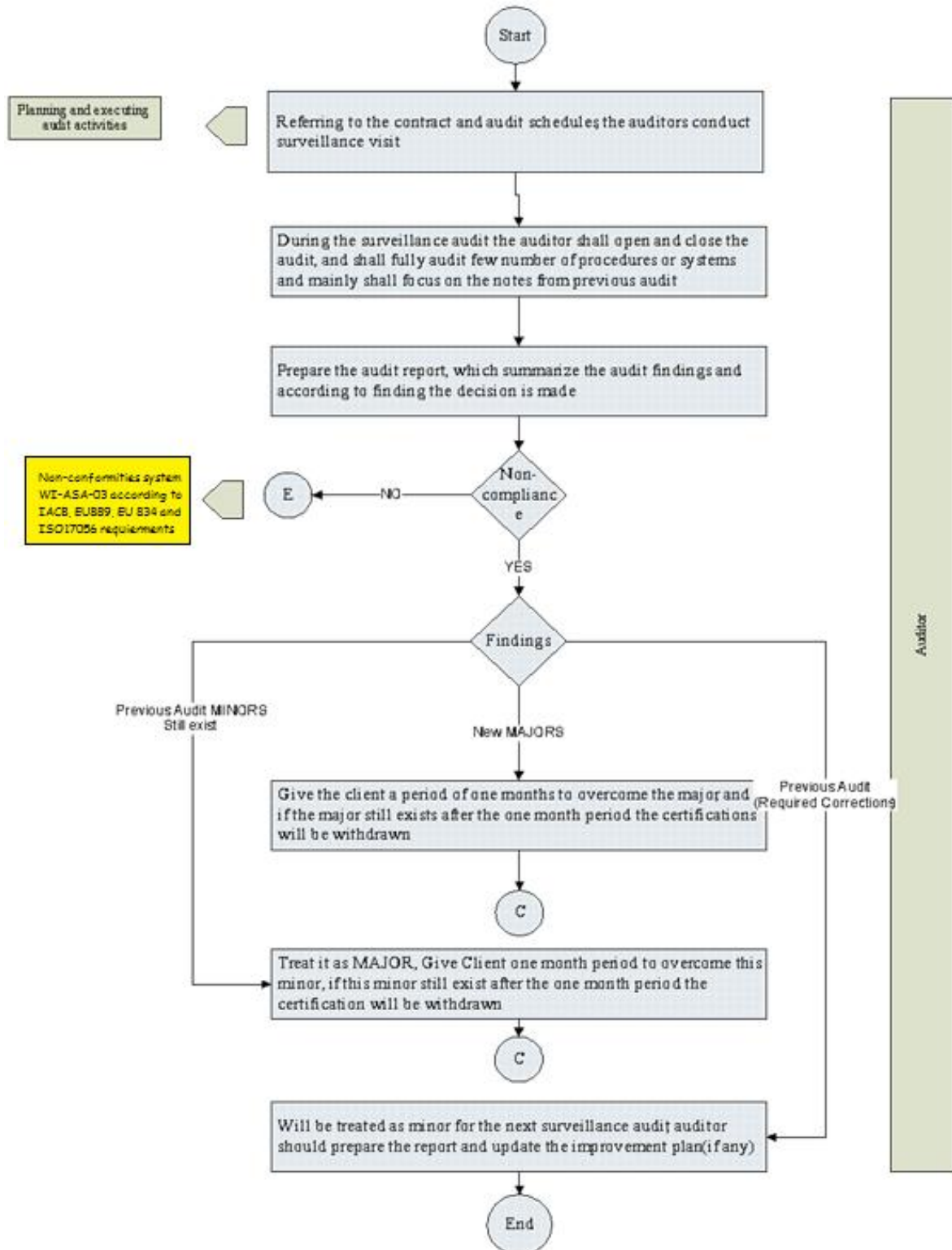


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(2) Auditing and Certification Process



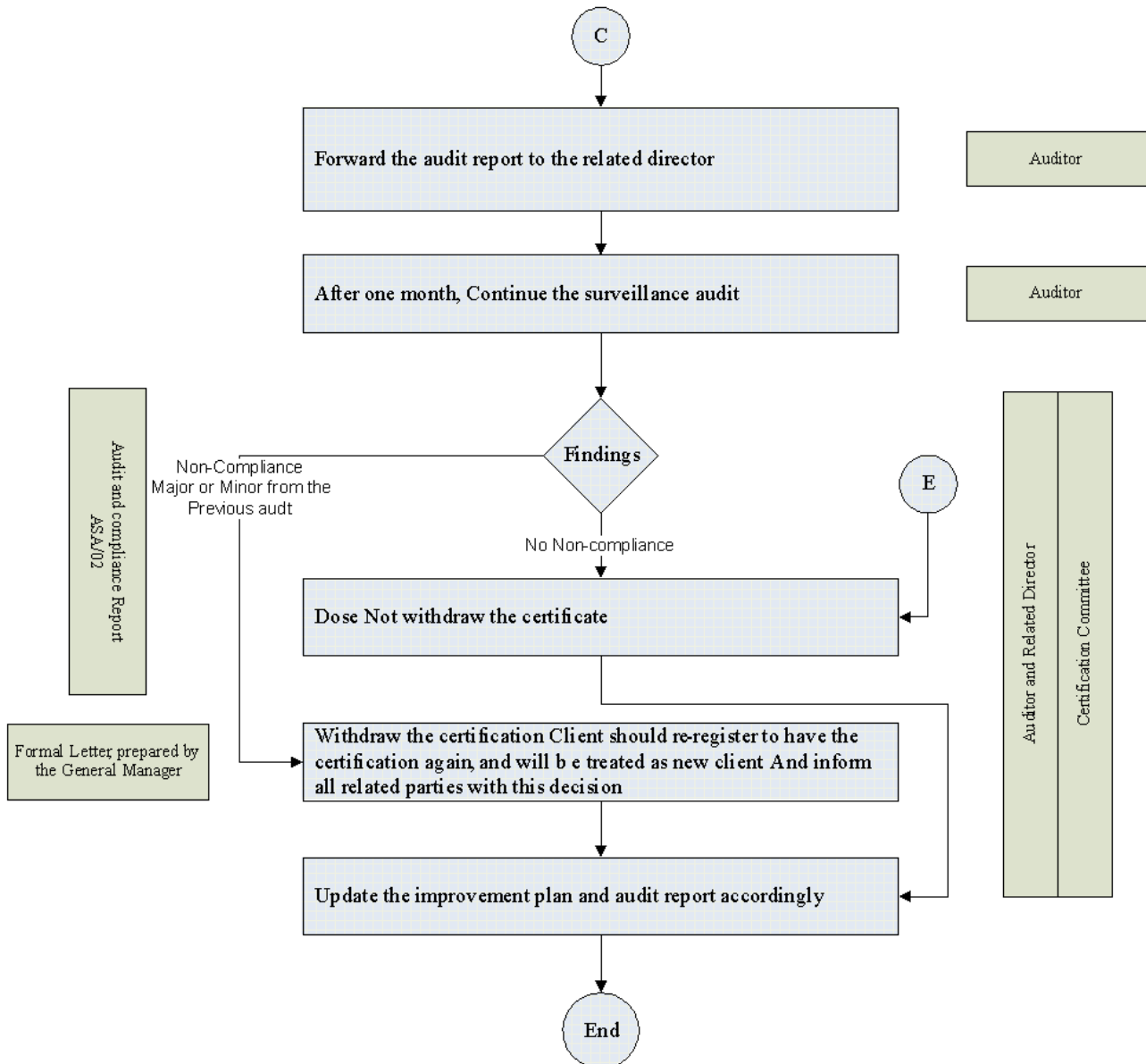
### (3) Surveillance Audit






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**(3) Surveillance Audit**



**5 Review and Certification decision**

1. The certification director decides on the issuance of certification, after the review of audit reports submitted by auditors (inspectors), ensuring the certification

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agreement is signed and the decision to grant or extend the scope of certification has been made.


### 5.1 Criteria for Granting Certification

COAP may grant and issue the certificate to the client under the following criterion:

1. The client has a documented Management system that is laid in accordance to its scope of certification and that it conforms to the requirements of the applicable Management System Standard as mentioned above.
2. The Client has implemented the management system and have completed at least one cycle of internal audit and management review of the management system established.
3. Both internal audit and management review have been found effective as assessed by COAP auditors.
4. The client has paid all the dues including the certification fee.
5. The client shall keep a record of all complaints and actions taken and the same shall be submitted to COAP auditors for verification when requested.
6. The client has undergone the stage-1 and stage –2 audits satisfactory and the recommendation of the audit team is favorable.

### 6 Certification documentation

1. COAP and operators are subjected to different auditors and audit schemes like governmental audits, COAP and its operators are committed to exchange the information's of such audits and the audits results between different auditors in accordance with EU/889 article 92., and this is covered also within the contract ADR-03.
2. COAP inspector while inspecting the farms, shall take into consideration that the operator vendors has declared that the supplied products are comply with EU/889 regulations, those vendors and operators may use declaration form like the Form ASA-12.

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- COAP shall issue an original of organic certificate to the operator to cover his organic products according to certification scheme.

### 6.1 Accepting other certificates results

- When an operator has some certificates like Global GAP, ISO9001, HACCP ISO 22000, COAP accept those certificate in it's scope and reduce the audit and inspection which overlap with those certificate, for example if operator is ISO 9001 certified, then COAP will not audit the QMS (whole full audit) since other certification body conduct the audit, by mean
- COAP will exclude the common items between the needed COAP certificates and current operator certificates and conduct the audit and inspection for non-common items which are scarce for the certificate.
- When the operator has organic certificate from another certification body, COAP accept the certificate provided that the certification body is accredited by accreditation body such as IOAS.

### 6.2 Transaction certificates


- In case the operator exports organic product (certified organic products holding certificate ASA-09) to EU, General manger shall inform the operator to send invoices of organic products. to compare the quantities of organic products.
- COAP shall review the following:
  - Documentary check of inspection reports (Audit and Compliance Report ASA-02, Wild planet report ASA-03, or Inspection Checklist and Report for Processor / Exporter ASA-05),
  - All relevant inspection documents, including in particular the production plan for the products concerned, transport documents and commercial documents.
  - COAP has either made a physical check of the consignment, or it has received an explicit declaration of the exporter declaring that the consignment concerned has been produced and/or prepared, COAP shall carry out a risk-oriented verification of the credibility of this declaration in accordance to:

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- The product has been produced in accordance with production rules to organic agricultural standards IACB, EU889 and EU834.
  - the operators have been subject to COAP control measures and have been permanently and effectively applied;
  - The operators at all stages of production, preparation and distribution have submitted their activities to CAOP.
  - The product is covered by a certificate of inspection issued by COAP which confirms that the product satisfies the conditions set out in this paragraph.
4. COAP shall give a serial number to each issued certificate and keep a register of the delivered certificates in chronological order.
  5. COAP shall issue the certificate of inspection in one of the official languages of the Community and filled in, except for the stamps and signatures, either entirely in capital letters or entirely in typescript.
  6. CAOP shall fill transaction certificate TC form (certification of inspection of products from organic production into European community) EU1235:2008, annex V.
  7. COAP shall register as certification body on Traces online, by using username and password, and relevant information.
  8. CAOP shall print out transaction certificate TC form, and hand-signed.
  9. CAOP shall send original certification and TC transaction certificate TC to the operator.
  10. Operator shall send them to first importer.


## **7 Directory of certified products**

1. Operator shall not release the product as certified product until receive the formal certification (ASA-09).
2. If the operator is processor (such as olive oil press or mill), certification director shall clarify if the operator is licensed to sell his products, or licensed to store the product in his own storage.

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## 7.1 Procedures and requirements for the use of the license

1. Scope of license
2. Non- assignment. Applicant agrees that the rights granted to Applicant under the License, and obtained by Applicant as a result of its application, are license rights only. Applicant shall not attempt to assign this License to any person and such attempted assignment shall automatically void this License.
3. Applicant's use of the Certification Mark.
  - a. Certification Mark format
  - b. Proper notice and acknowledgment
4. Term and termination
  - a. Term and termination upon notice
  - b. Automatic termination for cause
  - c. Effect of termination
5. Where COAP 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, COAP can require that the operator may provisionally not market the product with this reference for a time period to be set by COAP.
6. Before taking such a decision, COAP shall allow the operator to comment. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if CAOP is sure that the product does not fulfill the requirements of organic production.
7. if the suspicion is not confirmed within the said time period, the decision referred to in previous points shall be cancelled not later than the expiry of that time period. The operator shall cooperate fully with COAP in resolving the suspicion.
8. Precautions for Operator in case of procurements of materials or products to be market as organic or which is used in processing the organic products. Operator shall ensure that those product and material are organic and shall keep all records which indicate that it is organic like organic certification, operator also shall conduct the needed lab tests for products and materials and shall keep those

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records and other records in which COAP can inspect this, otherwise the products affected by those material will not be considered as organic.

## 8 Surveillance

1. Annually MRQ lays down the Plan of Inspection Audits (ASA-01) related to all the Areas/Processes involved in the Quality Control System and submits it for the EM's approval. The IIA Plan to be carried out during the year will study:
  - a. The importance of the process under inspection under the aspect of the quality of services delivered;
  - b. The results of the previous audits;
  - c. The complexity of the activities performed;
  - d. The need to verify the effectiveness of possible Corrective Actions previously launched.
2. The Plan indicates the Processes of the Quality Control System subject to auditing and the month they are to be carried out. The Plan cites moreover the function involved in the IIA and the auditor chosen, specifying whether the auditor is an internal or external to the organization. As a rule, each area of the Quality Control System (QCS) is audited at least once a year: the processes retained to be critical (related to previously defined standards) must be verified every six months.
3. The form (ASA-01) is the document used for both the annual plan of the IIA, and the registration of the auditing activities implemented, and of the related results (Audit Index).

## 9 input products approve

- 1 Where the operator wants to use fertilizers or protection material or seed or any input material and the operators shall inform COAP before buying the fertilizers or protection material or seeds or input material to get permission by filling "Application for Permission" ASA-07, then COAP shall investigate and study the required material specially producer, organic certificate, Nitrogen percentage, referred in Annex I in EU889 standard and article 16 in EU834 standard and

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EU 889.45.7 and decide accordingly and inform the operator with COAP decision to premise the operator to use seeds or any input materials including fertilizers and protection materials (The authorization shall be granted only to individual users for one season at a time. Showing the reasons of rejection.

2 COAP shall investigate and study the required material specially producer, organic certificate, Nitrogen percent, and decide accordingly.

3 CAOP make sure the following:

1- Organic certificate of input materials including fertilizers or protection material using the code.

2- CAOP apply for the certification of these materials from the certification body.

3- Contact with local importer to get certificate of these material and importing documents.


4- CAOP have to issue a list of approved material ASA-25 and update if needed.

5- Nitrogen percent, referred to in Annex I in EU889 standard and article 16 in EU834 standard.

4 Where the operator uses fertilizers or protection material, shall filling out agricultural activities in the farm (Fertilizer or protection material ) "ASA-17" and keeping the log and all related documents (such as invoice, selling order). COAP inspector shall inspect and evaluate the declared used quantities by the operator and-in case of suspicion-collect soil lab. Samples to evaluate the residual of pesticide and fertilizer.

## 10 Managing Changes affecting certification

1. COAP whenever new amendment over certifications are done, COAP informs all of its certified operators about the new changes and give them guidance about how to fulfill the new requirements, by referring to the list of certified operators in **COAP newsletter (ASA-22)**, and COAP shall follow up with operator about the needed corrective actions, COAP shall make sure that operators fulfill the amended requirements within the surveillance visits.

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2. COAP shall inform its operators for any changes such as evaluation, review, decision, issuance of revised formal certification documentation to extend or reduce the scope of certification, and issuance of certification documentation of revised surveillance activities, that affecting on them or certification, and ensure these changes are communicated to them by Fax , telephone, email etc in **COAP newsletter (ASA-22)**.
3. COAP shall verify the implementation of the changes by its operators and shall take actions required by the scheme during surveillance visits.
4. Changes initiated by the operator shall be considered affecting certification, COAP shall decide upon the appropriate actions.
5. The actions shall be completed in accordance with standards.


### 10.1 Changes on certification requirements

1. If COAP decides to change the requirements, based on the audits and certifications being made, COAP shall take into consideration the opinion of all interested parties, many mythologies can be used to gain those opinions like focus group

### 10.2 Managing changes from international accreditation body (IOAS)

1. IOAS shall organize an annual inspection of COAP to assure conformity to the accreditation standards annually.
2. IOAS shall organize annual inspection in surveillance visits or remote surveillances or both depending on the degree of conformity to the accreditation standards.
3. IOAS shall inform COAP with any deviations from the accreditation standards, conformities, notes, or more information.
4. COAP shall take into account the results of the work of the national accreditation body (IOAS), and shall change or develop certification system to comply with the accreditation standards, and take corrective and preventive actions.



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5. Where certification system is developed, COAP shall inform its operator , other control bodies, and the competent authorities with developed certification according to sections 10 (Exchange of information's between COAP and other certification or third parties that has audit over the operators) and 12 (Managing changes affecting certification).

## **11 Termination, reduction, suspension or withdrawal of certification**


1. When needed the operator may apply to reduce the areas of his/her farm using area reduction application form (ASA-08)

### **11.1 Reduction in scope of certification**

1. COAP shall decide to reduce the client's scope of certification by excluding the parts not meeting the requirements, when the client has persistently and seriously failed to meet the certification requirements for those parts of the scope of certification. Such exclusions shall be consistent with the certification standard, those parts of the scope of certification. Such exclusions shall be consistent with the certification standard upon request from any party; COAP shall provide information related to the validity of a given certificate.
2. COAP can reduce; enlarge the scope of certification where possible to avoid withdrawal of certificates for example in cooperation with applicant.


### **11.2 Sanctions and Suspension**

1. Non-conformities system WI-ASA-03 at least listing infringements and irregularities affecting the organic status of products and corresponding measures to be applied by COAP in case of infringements or irregularities by operators under their control who are involved in organic production.
2. COAP shall apply and follow-up to Non-conformities system WI-ASA-03 to be applied in case of infringements or irregularities, shall take into account the results of the work of the national accreditation body (IOAS) which shall verify the

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implementation and following-up this catalogue during annual inspection of CAOP.

3. COAP shall suspend certification in cases wherein:
  - a. The client's certified management system has persistently or seriously failed to meet certification Requirements, including requirements for the effectiveness of the management system.
  - b. The measures that COAP intends to apply where irregularities and/or infringements are found.
  - c. The client does not allow surveillance and re-certification audits to be conducted at the agreed frequencies.
  - d. Wishful misuse of logo & reference to certification.
  - e. Noncompliance to submission of Corrective action as stated in section.
  - f. Nonpayment of dues to COAP.
  - g. If discovered that the operators use material that violate the organic production, COAP shall suspend the certificate, Unless the operator officially inform COAP and prepare the needed corrective action to eliminate such things to re-occurrence, COAP shall follow up the corrective action and shall also increase the frequency of surveillance visits.
  - h. In case of fraud products are discovered. COAP shall suspend the certification immediately and the operator shall not market the product as organic (operator may market the products as non-organic or natural products). COAP shall perform inspection and according to inspection results the action shall be taken (either to continue the certificate or to withdraw the certificates).
  - i. When a nonconformity with certification requirements is substantiated, either as a result of surveillance or otherwise, COAP shall consider and decide upon the appropriate action
  - j. Certification director shall take decision of suspension, formulate and communicate to the client actions needed to end suspension and restore certification for the product(s) in accordance with the certification scheme; and any other actions required by the certification scheme.


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4. The suspension shall be for a period of maximum six months and the suspended status of the client shall be publicly made available in the register of certified clients being maintained by COAP at its registered office. During this period the client's management system certification is temporarily invalid and the client shall discontinue the use of logo or any reference of certification in advertising matter.
5. GM shall update suspension record (ASA- 19) and update COAP site.
6. The client shall implement corrective and preventive actions during this period.
7. Certification director shall assign qualified inspector to re-evaluate the client according to the standards.
8. Inspector shall send the inspection report to certification director.
9. If the results are positive, and so the certification director is reinstated after suspension, the certification body COAP shall 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.
10. If a decision to reduce the scope of certification is made as a condition of reinstatement, COAP shall 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.

### 11.3 Withdrawal

1. COAP shall withdraw the certificate under the following circumstances
2. Failure of the client to resolve the issues of suspension within six months shall result in withdrawal of certification.
  - a. Other reason like major legal complaint, company involved in malpractices, COAP loses accreditation etc

### 11.4 Client voluntarily requested for a withdrawal

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1. Upon withdrawal of certification the client ceases to enjoy the certification status and the client shall immediately cease use and distribution of any Literature, stationary etc bearing the mark. The artwork supplied and all the Original approval certificates are to be returned to COAP.

### **11.5 Investigation of probable non-conformity**


1. In case of probable non-conformity according to organic standards and COAP system requirements and this case is not clear enough for certification director, inspector, or certification body to take a decision, general managers shall assign a team of investigation to investigate the case.
2. Investigation team shall collect all required evidences and related documents (lab. reports if needed) that are required to reasonable and transparent investigation
3. Investigation team shall issue investigation report ASA-24 including considerations, evidences, and recommendations.
4. Investigation team send the report to certification director to take suitable decision.

## **12 Records**

1. Operator shall keep all products and raw materials records for inspection and all quality management system records and documents shall be also kept properly. Operator shall identify the retention period of the records in accordance with local applied legislation.
2. Premises shall enable the operator to identify and the control authority or control body to verify:
  - a. The supplier and, where different, the seller, or the exporter of the products;
  - b. The nature and the quantities of organic products delivered to the unit and, where relevant, of all materials bought and the use of such materials, and, where relevant, the composition of the compound feeding stuffs;
  - c. The nature and the quantities of organic products held in storage at the premises;

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- d. The nature, the quantities and the consignees and, where different, the buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities;
  - e. In case of operators who do not store or physically handle such organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees.
3. The documentary accounts shall also comprise the results of the verification at reception of organic products and any other information required by the control authority or control body for the purpose of proper control. The data in the accounts shall be documented with appropriate justification documents. The accounts shall demonstrate the balance between the input and the output.
  4. Where the operator shall declare the suppliers and supplied material by using List of suppliers of raw materials (ASA-06) and sign the declaration.
  5. Where an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements
  6. COAP to provide its requirements for acceptance of prior or current certification of its operators by other certification bodies, where it takes responsibility for the results and satisfies itself that the body that performed the evaluation fulfills the requirements of outsourcing according to Contract Review procedure (COR) and those specified by the certification scheme.
  7. COAP as control authority shall conduct random visits to operators mainly to inspect the risks, inspector shall report about such visit accordingly.
  8. Upon a request duly justified by the necessity to guarantee that a product has been produced in accordance with this Regulation, the competent authorities, control authorities and the control bodies shall exchange relevant information on the results of their controls with other competent authorities, control authorities and control bodies. They may also exchange such information on their own initiative.

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9. The level of communication shall depend on the severity and the extent of the irregularity or infringement found.

### **12.1 Exchange of information's between COAP and other certification or third parties that has audit over the operators**

1. COAP receives the right to call for other auditors or audit bodies governmental audited results from the operator and operator shall have no obligations for the contact between COAP and other auditors.
2. COAP shall notify by email or fax the operator with the requested documents of the third parties, which impose the operator with some kinds of audit services.
3. The operator who places such products on the market shall, prior to place in on the market of any products as organic or in conversion to organic: submit his undertaking to an authorized control body.
4. CAOP shall exchange relevant information with competent authorities, control authorities, control bodies upon a request duly justified by the necessity to guarantee certified product gas been produced in accordance to the certification scheme. This information exchange depends on the severity and the extent of irregularities or infringement found.
5. COAP shall document the exchanged information in previous point by confidential information exchange ASA-16.
6. Operator shall have a separate file contains all auditors and auditing bodies documents including the correspondences, and this file shall be part of the quality management system, in which COAP or other bodies can access the information within the file.
7. Whenever third parties that give a COAP certified operator some kinds of audit services requested information from COAP about the operator system, COAP shall have a written approval from the operator prior giving this information.
8. CAOP shall exchange the relevant information on the operations where operators and/or their subcontractors change their control authority or control body, the


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change shall be notified without delay to the competent authority by the control authorities or control bodies concerned.

9. If the operator is certified by another certification body and want to change certification to COAP, COAP shall ensure that non-conformities noted in the report of the previous certification body have been or are being addressed by the operator.
10. Where the operator withdraws from COAP, COAP shall, without delay, inform the proceeding certification body.

## 12.2 Confidentiality and public information

1. COAP shall be responsible for managing all obtained or created information during the performance of certification activities excluding information that the operator makes publicly available or when agreed between COAP and the operator ( such as the purpose of responding to complaints), otherwise all information must be considered confidential; so all COAP staff is only persons can deal with operator records, and outsources body deal with operator records shall commit to keep them confidential by signed contractual agreement and declaration form COR-04.
2. COAP shall notify the operator when it is required by law or authorized by contractual arrangements to release confidential information by using external memo, email or fax (Written consent to disclose).
3. COAP shall treat the information obtained from sources other than the operator such as complaints or regulators.
4. COAP shall ensure that its staff and outsourced bodies to deal with operator information confidentiality.
5. COAP shall keep records confidential when obtained, collected, analyzed, transported, transmitted, and transferred confidentially; COAP staff use paper records and maintained all related information in the office, while electronic records are maintained in backup CDs which are isolated from penetration,

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besides COAP shall use high reliable software that prevent any penetration when sending and receiving information via email.

6. COAP shall keep records confidential and shall follow Documents and Records Control procedure (DRC) for determine the controls needed for identification, storage, protection, retrieval, retention time and disposition these records.
7. COAP shall through publication, electronic media, COAP website, or other means maintain and available upon request, and also in application form (ADR-01) and shall follow WI-ADR-01 (admission):
  - information of scope of work, certification procedures such as granting, maintaining, suspending or withdrawing;
  - COAP financial supports and incomes, fees;
  - Description of rights and duties of applicants or operator, requirements, restrictions or limitations on the use COAP name and certification mark and on the ways of referring to the certification granted.
  - Information about procedures for handling complaints and appeals.

### **13 Requests for CAOP recognition**

1. The Commission may recognize COAP according to EU 834- Article 27 competent to carry out controls and issue certificates for the purpose exporting organic products.
2. The Commission shall set out guidelines, models and questionnaires where appropriate and make them available in the computer system referred to exporting organic products.
3. These guidelines, models and questionnaires shall be adapted and updated by the Commission, after having informed the Member States and the competent authorities of third countries, as well as COAP recognized in accordance with EU 1235 Regulation.
4. The computer system shall be able to collect the requests, documents and information referred to EU 1235 Regulation where appropriate, including the authorizations granted.




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5. The supporting documents shall be kept by COAP at the disposal of the Commission and the Member States for at least three years following the year in which the controls took place or the certificates of inspection and documentary evidence were delivered.
6. The assessment of equivalency shall take into account Codex Alimentarius guidelines CAC/GL 32.
7. The Commission shall examine any request for recognition lodged by COAP.
8. When examining requests for recognition, the Commission shall invite COAP to supply all the necessary information.
9. COAP shall undergo regular on-the-spot evaluation, surveillance and multiannual re-assessment of their activities by IOAS or, as appropriate, by a competent authority.
10. The Commission may also entrust experts with the task of examining on-the-spot the rules of production and the control measures carried out by COAP.
11. The recognized COAP shall provide the assessment reports issued by IOAS or, as appropriate, the competent authority on the regular on the-spot evaluation surveillance and multiannual re-assessment of their activities.
12. Based on these assessment reports, the Commission shall ensure appropriate supervision of recognized COAP by regularly reviewing their recognition.
13. The nature of the supervision shall be determined on the basis of an assessment of the risk of the occurrence of irregularities or infringements of the provisions set out in EU 834.

#### **IV. Performance Indicators:**


The General Manager shall prepare report including the following indicators each six months

- i.** No of issued certificates
- ii.** Percentage of increase or decrease in certificates

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## V. Related Documents and Records

Document Name	Document No.	Responsibilities	Retention Time	Storage
Audit Schedule (inspection plan)	ASA-01	General Manager	(2) Years	G.M Office
Inspection Report for Organic Farms	ASA-02			
Inspection Checklist and Report for Processor / Exporter	ASA-05			
Contract	ADR-03	General manager	4 years	GM office
Inspection Report for Collection of Wild Plants	ASA-03	General manager	2 years	GM office
Cultivation plan	ASA-04			
Suppliers List	ASA-06	None	None	None
Application for Permission	ASA-07	GM	2 years	GM office
Area Reduction Form	ASA-08	GM	2 Years	GM Office
Certificate	ASA-09	Operator/ copy in the file	3 years	File
Farm information report	ASA-10	Farm file	3 years	File
Declaration of interest in accordance with ISO 4.10.2	ASA-11	GM	3 years	GM office
Vendor Declaration for Operator (From to be used by operators)	ASA-12	GM	3 Years	GM Office
Declaration of Interests	ASA-13	GM	3 Years	GM Office
List of operators	ASA-14			
documents check list	ASA-15			

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confidential information exchange	ASA-16			
agricultural activities in the farm	ASA-17			
Adopted certification actioners	ASA-18			
Suspension record	ASA-19	GM	3 years	GM office
Production log sheet	ASA-20			
Sampling report	ASA-21			
COAP newsletter	ASA-22			
central management agreement	ASA-23		Certificate period	
Investigation report	ASA-24		3 years	
Approved input products	ASA-25			

## VI. Related Work Instructions

1. Audit and certification instruction WI-ASA-01
2. General Safety Instruction WI-ASA-02
3. Non-conformities system WI-ASA-03
4. Products Authorization-WI-ASA-04
5. Sampling Guidelines WI-ASA-05
6. Risks Management WI-RIM-01