

From: [Zuck, Penelope - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: Accepted: ETKO

From: [Mann, Renee - AMS](#)
To: [Lopez, JasonJ - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with Lopez, JasonJ - AMS
Date: Friday, December 18, 2015 9:37:09 AM

Mann, Renee - AMS 9:33 AM:

Hi Jason, please forward the Canada/ETKO emails to me (the ones Cheri sent you)

Lopez, JasonJ - AMS 9:33 AM:

OK

Mann, Renee - AMS 9:37 AM:

Thanks.

From: [McEvoy, Miles - AMS](#)
To: [McEvoy, Miles - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with McEvoy, Miles - AMS
Date: Friday, December 11, 2015 10:59:12 AM

McEvoy, Miles - AMS 10:46 AM:

Hi Renee - do you know when AIA will have a draft of the ETKO proposed suspension and settlement?

Mann, Renee - AMS 10:47 AM:

I don't know - Penny is working on that and she's been out on an audit all this week. Probably next week.
We can make it a priority. I know you're leaving on vacation.

Miles McEvoy 10:47 AM:

ok, thanks

Yes, it would be good to get it out next week

Mann, Renee - AMS 10:47 AM:

OK, I'll let Penny know.

From: [Mann, Renee - AMS](#)
To: [Zuck, Penelope - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with Zuck, Penelope - AMS
Date: Tuesday, December 22, 2015 9:59:15 AM

Mann, Renee - AMS 9:46 AM:

FYI - ETKO's annual report is due January 22. They still need to submit this while they're in good standing with us.

Mary Lou sent them a notice on 12/16 about the annual report, but if you're going to send them an email with answers, could you please remind them that it is due.

Zuck, Penelope - AMS 9:47 AM:

Ok, I'll remind them again.

Mann, Renee - AMS 9:47 AM:

Thanks.

From: [Zuck, Penelope - AMS](#)
To: [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)
Subject: ETKO & Food Safety

Hi Cheri,
I'd like to meet with you to discuss the NoPS for ETKO and Accreditation Committee results for Food Safety Renewal (1 finding was not issued as a noncompliance).

Thanks,
Penny

From: [Swartwood, Stacy - AMS](mailto:cb@etko.com.tr)
To: cb@etko.com.tr
Cc: ma@etko.com.tr; Claypool, Rebecca E - AMS
Subject: FW: Client Registration into USDA Database
Date: Thursday, December 22, 2016 8:22:29 AM
Attachments: [image001.jpg](#)

Good day, Ceren!

Our recommendation for resolving the duplicate operation entries based on data management best practices is to update the original operation record (NOP Operation ID 9963092013) with the new Client ID (3220D-02) and other details such as the additional items listed for the new operation record (NOP Operation ID 9963220002). Once that has been completed, I can assist with managing the duplicate new operation record.

This recommendation is based on findings in the database as follows:

- Grainagro – Surrendered 8/8/2016
- Ukrfield – Certified 11/1/2016
- We could not locate any operations named “Dnepryanske” but did find Dnipryanske HPP (3220D-02) – Certified 11/17/2016 (NOP Operation ID 9963220002)
- We could not locate any operations with Client ID 3092D-13, but did find another operation named Dnipryanske HPP – Certified 12/3/15 (NOP Operation ID 9963092013)

Thank you!

Stacy

Stacy Swartwood
Program/Systems Analyst
USDA/AMS National Organic Program
South Building Room 2649, Ag Stop 0268
202/260-9443
stacy.swartwood@ams.usda.gov

From: AMS - AIAinbox
Sent: Wednesday, December 21, 2016 12:31 PM
To: Swartwood, Stacy - AMS <stacy.swartwood@ams.usda.gov>
Subject: FW: Client Registration into USDA Database

From: Ceren BAYAZIT [<mailto:cb@etko.com.tr>]
Sent: Tuesday, December 20, 2016 6:08 AM
To: AMS - AIAinbox <AIAinbox@ams.usda.gov>
Cc: ma@etko.com.tr
Subject: FW: Client Registration into USDA Database

Dear Ms. Rebecca,

We have a question about the registration into USDA Database. Last year, we certified an operator, formed of 2 traders (3092D-01 GRAINAGRO, 3092D-13 DNEPRYANSKE) and 4 farmers which have been already registered into the Database. This year, however, the trader GRAINAGRO has quit and in place of them, an another company has become the trader (3220D-01 UKRFIELD) of these 4 farms and DNEPRYANSKE. Somehow, I'd changed the client no.of DNEPRYANSKE as 3220D-02 and registered into the database. Thus, I want to delete the former one 3092D-13 but, I came to know that it's not allowed. Is there any way to be able to change the client no. in the database? I'd be grateful if you could provide any suggestion.

As for farmers, we consider to keep using the former client numbers as 3092F.

Thank you in advance.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

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Email/eposta: cb@etko.com.tr , Web: www.etko.com.tr

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From: [Tharp, Melissa - AMS](#)
To: [Atkins, Patricia - AMS](#); [Mann, Renee - AMS](#)
Subject: FW: Imports of organic soybeans
Date: Tuesday, September 27, 2016 2:44:45 PM
Importance: High

Mr. de Lap rouse is asking if he can get a response today on his questions below. Can one of you assist him?

From: Tharp, Melissa - AMS
Sent: Monday, September 26, 2016 2:35 PM
To: Tucker, Jennifer - AMS
Subject: FW: Imports of organic soybeans

I took a call from the gentleman below who had some questions regarding organic soybeans.

From: Philippe de Lap rouse [<mailto:pdelaperouse@highquestpartners.com>]
Sent: Monday, September 26, 2016 12:48 PM
To: Tharp, Melissa - AMS
Subject: Imports of organic soybeans

Dear Melissa,

Following my call to you a few minutes ago, here are the questions I have.

- What certifiers are accredited for soybean and or soybean meal imports from Romania and India?
- What tests are being conducted to verify organic shipments at arrival in the U.S. and at what is the acceptable tolerance level?
- What is the status of ETKO's [Ecological Farming Control Organization – Turkey] accreditation by the USDA given the fact that Canada suspended ETKO's accreditation on July 31, 2016?

Many thanks in advance for your response to these questions.

Philippe de Lap rouse

Managing Director

HighQuest Group

1005 North Warson Road, Suite 218

St. Louis, Missouri 63132

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1-314- 994-3282(o)

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www.highquestpartners.com

www.globalaginvesting.com

From: [Tucker, Jennifer - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting
Date: Tuesday, November 08, 2016 8:16:06 AM

Just wanted you to be aware.

Jenny

From: McEvoy, Miles - AMS
Sent: Tuesday, November 08, 2016 5:04 AM
To: Courtney, Cheri - AMS
Cc: Tucker, Jennifer - AMS ; Lewis, Paul I - AMS ; Gebault King, ReneeA - AMS
Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting
Please prepare talking points for these questions as they are under AIA responsibilities. Thanks.

From: Abby Youngblood [<mailto:abby@nationalorganiccoalition.org>]

Sent: Monday, November 07, 2016 4:52 PM

To: McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>

Cc: (b) (6)

Subject: thank you for joining us on November 15 at the Pre-NOSB meeting
Dear Miles,

Thank you for joining us at our Pre-NOSB meeting next week on Tuesday the 15th. I am writing to confirm that we have you scheduled to take part from 2:30 to 3:30. Are there others from USDA who will be able to join us?

We are planning on a Q&A format, similar to the format we've had during the past several meetings. Two of the topics we would like to discuss are outlined at the end of this message. I will be in touch very shortly with one or two additional topics. During the meeting, we would like to present each of these topics to you, hear your response and have time for some discussion. Here is the general format we have in mind:

- 5 min for opening remarks from you
- 3 min or less for NOC member to present topic/question
- 4 to 5 min for your response
- 10 min for discussion

If we spend about 15 to 20 minutes on each question, we should be able to finish in the time allotted. We have approximately 50 people planning to attend, including about 20 NOC members, as well as 30 others, including farmers, NOSB members, certifiers, animal welfare groups, and organic industry members.

We appreciate your dedication to organic and your engagement with NOC and others during the meeting. Please do not hesitate to let me know if you have questions.

Best Regards,
Abby and Steve

1. QUESTION ON ORGANIC SEED

While the allowance for the use of non-organic seed in organic production is important for growers who lack access to appropriate organic seed, the organic seed requirement is inconsistently enforced. Many would like to see the NOP do more through guidance and regular trainings to create incentives for farms to use more organic seed and to establish a framework for continuous improvement in the use of organic seed.

How can this guidance be strengthened and what else can the NOP do to support increased use of organic seed? How will the NOP support tracking organic seed availability

by crop type and region on an annual basis?

2. QUESTION ON ORGANIC IMPORTS

Over the past few years, there has been a dramatic increase in imports of organic commodities, especially grains. A key area of concern for U.S. organic grain growers is whether these increased imports present an opportunity for fraudulently labeled organic products to enter the United States, undermining the opportunity for U.S. producers to get a fair price in the market. Long international supply chains may increase the opportunities for fraud due to breaks in the chain of recordkeeping, organic certification and verification that the USDA organic seal is built upon. The rise of imports from Turkey especially raises concern and one Turkish organic certifier, ETKO, has been decertified by the EU.

The NOP took the step of reminding importers of handling regulations on July 13, 2016, but this action is not enough to address the potential for fraud.

What plans does the NOP have to address this issue? Will the NOP require importers to be certified by an NOP accredited certifier going forward? What other systems will the NOP put in place to ensure the integrity of shipments of grains and other commodities?

--

Abby Youngblood

Executive Director

National Organic Coalition

Abby@NationalOrganicCoalition.org

Cell: (b) (6)

www.NationalOrganicCoalition.org

Twitter: @NationalOrganic

Facebook: Facebook.com/NationalOrganicCoalition

From: [Swartwood, Stacy - AMS](#)
To: [Mann, Renee - AMS](#); [Claypool, Rebecca E - AMS](#); [Courtney, Cheri - AMS](#)
Subject: RE: Client Registration into USDA Database
Date: Wednesday, December 21, 2016 1:26:19 PM
Attachments: [image001.jpg](#)

Hi Renee,

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

(b) (5)

Please let me know if that works for AIA.

Grainagro – Surrendered 8/8/2016

Ukrfield – Certified 11/1/2016

I can't find any operations named "Dnepryanske" but did find:

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

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

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

Stacy

Stacy Swartwood
Program/Systems Analyst
USDA/AMS National Organic Program
South Building Room 2649, Ag Stop 0268
202/260-9443
stacy.swartwood@ams.usda.gov

From: AMS - AIAinbox

Sent: Wednesday, December 21, 2016 12:31 PM

To: Swartwood, Stacy - AMS <stacy.swartwood@ams.usda.gov>

Cc: Claypool, Rebecca E - AMS <Rebecca.E.Claypool@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>

Subject: FW: Client Registration into USDA Database

Hi Stacy,
Is this something you can respond to?

Thanks,
Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Ceren BAYAZIT [<mailto:cb@etko.com.tr>]
Sent: Tuesday, December 20, 2016 6:08 AM
To: AMS - AIAinbox <AIAinbox@ams.usda.gov>
Cc: ma@etko.com.tr
Subject: FW: Client Registration into USDA Database

Dear Ms. Rebecca,

We have a question about the registration into USDA Database. Last year, we certified an operator, formed of 2 traders (3092D-01 GRAINAGRO, 3092D-13 DNEPRYANSKE) and 4 farmers which have been already registered into the Database. This year, however, the trader GRAINAGRO has quit and in place of them, an another company has become the trader (3220D-01 UKRFIELD) of these 4 farms and DNEPRYANSKE. Somehow, I'd changed the client no.of DNEPRYANSKE as 3220D-02 and registered into the database. Thus, I want to delete the former one 3092D-13 but, I came to know that it's not allowed. Is there any way to be able to change the client no. in the database? I'd be grateful if you could provide any suggestion.

As for farmers, we consider to keep using the former client numbers as 3092F.

Thank you in advance.

Saygilarimizla/ Best Regards
Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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From: [Ceren BAYAZIT](#)
To: [AMS - AIAinbox](#)
Subject: RE: ETKO- Annual Lists Due by January 2
Date: Tuesday, January 03, 2017 8:55:35 AM
Attachments: [image001.jpg](#)

Dear Ms. Renee,

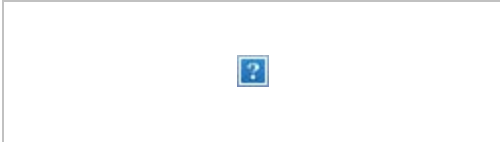
Thank you for your feedback.

Happy new year!

Best wishes,

Saygilarimizla/ Best Regards

Ceren BAYAZIT



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From: AMS - AIAinbox [mailto:AIAinbox@ams.usda.gov]
Sent: Tuesday, January 3, 2017 3:13 PM
To: Ceren BAYAZIT
Cc: ma@etko.com.tr; fa@etko.com.tr; ug@etko.com.tr
Subject: RE: ETKO- Annual Lists Due by January 2

Dear Ceren:

Thank you for notifying us that your list is updated. Happy New Year!

Kind Regards,

Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Ceren BAYAZIT [<mailto:cb@etko.com.tr>]
Sent: Monday, January 02, 2017 11:22 AM
To: AMS - AIAinbox <AIAinbox@ams.usda.gov>
Cc: ma@etko.com.tr; fa@etko.com.tr; ug@etko.com.tr
Subject: ETKO- Annual Lists Due by January 2

Dear Sirs,

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

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
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From: Reid, John - AMS [<mailto:John.Reid@ams.usda.gov>]
Sent: Wednesday, December 21, 2016 11:32 PM
To: Courtney, Cheri - AMS
Subject: REMINDER: Annual Lists Due by January 2
Importance: High

Dear USDA Accredited Certifiers:

This is a reminder that your lists of certified operations must be uploaded and successfully published in the INTEGRITY database by January 2, 2017. On December 13, 2016, we published an update to the Instruction for Submitting Annual Lists of Certified Operations (NOP 2026) to help you with this process: <https://www.ams.usda.gov/sites/default/files/media/2026.pdf>. If you have questions about submitting your list to INTEGRITY, you can find instructions on the INTEGRITY pages.

Also, please email the AIAinbox@ams.usda.gov on or before January 2 to inform us that your list in INTEGRITY is up-to-date. If you plan to submit your list early (i.e. in late December) and do not have any changes to submit through the January 2 deadline, you may email us early and to let us

know that your list is accurate and will not change through January 2.

We will issue noncompliances to certifiers that fail to ensure their list of certified operations is updated as of January 2.

Thank you for submitting your lists on time. If you have any questions, please direct these to your Accreditation Manager or the AIInbox@ams.usda.gov.

Thank you,

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

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From: [Reid, John - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: RE: ETKO Settlement?
Date: Monday, October 24, 2016 9:50:41 AM
Attachments: [image001.jpg](#)

No problem. I will investigate further in appeals.
John

From: Mann, Renee - AMS
Sent: Monday, October 24, 2016 8:04 AM
To: Reid, John - AMS ; Claypool, Rebecca E - AMS
Subject: RE: ETKO Settlement?

Hi John –

This is correct – they are in settlement. You can check the tracking sheet in appeals to double check, but that is my understanding.

See - P:\Appeals

-RM

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Reid, John - AMS
Sent: Wednesday, October 19, 2016 5:16 PM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Claypool, Rebecca E - AMS <Rebecca.E.Claypool@ams.usda.gov>
Subject: ETKO Settlement?

Hey,

While updating the AMS Website for Accredited Certificates and CA Reports, (b) (5) [REDACTED]
[REDACTED]. Are they in a Settlement?

Just for awareness. Thanks

Respectfully,

John A. Reid



Program/Operations Analyst

USDA | National Organic Program

1400 Independence Avenue SW | 2649-S | Washington DC 20250

Main: (202) 260-9452 | **Cell:** (b) (6) [REDACTED]

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From: [Claypool, Rebecca E - AMS](#)
To: [Mann, Renee - AMS](#)
Cc: [Courtney, Cheri - AMS](#)
Subject: RE: Imports of organic soybeans
Date: Tuesday, September 27, 2016 4:45:13 PM

Will do.

Thanks

From: Mann, Renee - AMS
Sent: Tuesday, September 27, 2016 4:43 PM
To: Claypool, Rebecca E - AMS
Cc: Courtney, Cheri - AMS
Subject: FW: Imports of organic soybeans

Hi Rebecca – please send the response you drafted. Copy Melissa, me and Cheri.

Thanks,

Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Courtney, Cheri - AMS
Sent: Tuesday, September 27, 2016 4:40 PM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>
Subject: RE: Imports of organic soybeans

This is good to go – I ran it by Miles.

Cheri

From: Mann, Renee - AMS
Sent: Tuesday, September 27, 2016 4:22 PM
To: Claypool, Rebecca E - AMS <Rebecca.E.Claypool@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: RE: Imports of organic soybeans

Rebecca,

Thanks for your quick work on this. This is excellent. I think Cheri is going to forward it to Miles now.

-Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Claypool, Rebecca E - AMS
Sent: Tuesday, September 27, 2016 4:20 PM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: Imports of organic soybeans

Renee and Cheri,

Here is my draft response to Mr. de Lap erouse. Please edit or make suggestions as needed.

Thanks!!

Rebecca

Dear Mr. de Lapérouse,
Thank you for your questions, and I hope my answers below are helpful.

[REDACTED]

[REDACTED]

[REDACTED]

Please let me know if I can be of further assistance.

Kind regards,

Rebecca

Rebecca Claypool

Accreditation Manager

USDA National Organic Program

1400 Independence Ave SW

Washington, DC 20250

(202) 350-5706

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From: [Claypool, Rebecca E - AMS](#)
To: [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#)
Subject: RE: Imports of organic soybeans
Date: Tuesday, September 27, 2016 4:25:11 PM

Happy to help. 😊

From: Mann, Renee - AMS
Sent: Tuesday, September 27, 2016 4:22 PM
To: Claypool, Rebecca E - AMS ; Courtney, Cheri - AMS
Subject: RE: Imports of organic soybeans

Rebecca,

Thanks for your quick work on this. This is excellent. I think Cheri is going to forward it to Miles now.

-Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Claypool, Rebecca E - AMS
Sent: Tuesday, September 27, 2016 4:20 PM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: Imports of organic soybeans

Renee and Cheri,

Here is my draft response to Mr. de Lap rouse. Please edit or make suggestions as needed.

Thanks!!

Rebecca

Dear Mr. de Lap rouse,

(b) (5)

[REDACTED]

Please let me know if I can be of further assistance.
Kind regards,
Rebecca

Rebecca Claypool
Accreditation Manager
USDA National Organic Program
1400 Independence Ave SW
Washington, DC 20250
(202) 350-5706
[Get USDA Organic Insider updates!](#)

From: [Wilburn, Tammie - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: RE: List of Certifiers contacted for Turkish Imports
Date: Tuesday, November 29, 2016 1:05:35 PM

Call before 3 please

From: Mann, Renee - AMS
Sent: Tuesday, November 29, 2016 12:57 PM
To: Wilburn, Tammie - AMS
Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

Do you know if the list of certifiers below would be any smaller if we only searched for certifiers who certify handlers (not producers) of corn? Miles wants us to limit our letter to *handlers*.

Also, I have some questions for you about the list of countries you searched in... do you have some time early this afternoon to chat?

Thanks,
Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Wilburn, Tammie - AMS
Sent: Tuesday, November 22, 2016 3:16 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>
Subject: List of Certifiers contacted for Turkish Imports

Hi Cheri,

Following is the list of certifiers I've requested information from. I have not heard back from ACO, Etko and BioAgricert. It would be great if AIA would send these three certifiers a reminder to respond to my request as soon as possible.

1. BioInspecta
2. BCS
3. Control Union
4. EcoCert
5. LACON

6. IBD – nothing to report from Eastern Europe or Turkey.
7. ACO
8. ETKO
9. BioAgricert

Per the data we received from Andrew from ACE, the following U.S. Based certifiers are involved so far. I will more than likely add to this list as I go through and receive more information from certifiers.

1. ProCert
2. QAI
3. CCOF
4. PCO
5. CERES

Tammie Wilburn
Compliance and Enforcement Division
National Organic Program
1400 Independence Avenue, S.W.
Room 2646 (Stop 0268)
Washington, D.C. 20250
(202) 690-2624 (direct line)

Organic Integrity from Farm to Table, Consumers Trust the Organic Label

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From: [Wilburn, Tammie - AMS](#)
To: [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#)
Cc: [Holmes, Vella - AMS](#)
Subject: RE: List of Certifiers contacted for Turkish Imports
Date: Tuesday, November 29, 2016 3:41:12 PM

Ok thanks.

From: Mann, Renee - AMS
Sent: Tuesday, November 29, 2016 3:36 PM
To: Wilburn, Tammie - AMS; Courtney, Cheri - AMS
Cc: Holmes, Vella - AMS
Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

To follow-up on our conversation today, here are the certifiers that I found listing handler clients who handle corn, maize, zea maize, or zea mays in one of the 11 countries listed in the AIA letter:

1. BioInspecta
2. Kiwa-BCS (Note their name has changed to "Kiwa-BCS")
3. Control Union
4. EcoCert
5. ETKO
6. IMO Swiss AG (this one wasn't on your list below)

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Wilburn, Tammie - AMS
Sent: Tuesday, November 22, 2016 3:16 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>
Subject: List of Certifiers contacted for Turkish Imports

Hi Cheri,

Following is the list of certifiers I've requested information from. I have not heard back from ACO, Etko and BioAgricert. It would be great if AIA would send these three certifiers a reminder to respond to my request as soon as possible.

1. BioInspecta
2. BCS
3. Control Union
4. EcoCert

5. LACON
6. IBD – nothing to report from Eastern Europe or Turkey.
7. ACO
8. ETKO
9. BioAgricert

Per the data we received from Andrew from ACE, the following U.S. Based certifiers are involved so far. I will more than likely add to this list as I go through and receive more information from certifiers.

1. ProCert
2. QAI
3. CCOF
4. PCO
5. CERES

Tammie Wilburn
Compliance and Enforcement Division
National Organic Program
1400 Independence Avenue, S.W.
Room 2646 (Stop 0268)
Washington, D.C. 20250
(202) 690-2624 (direct line)

Organic Integrity from Farm to Table, Consumers Trust the Organic Label

Register for the NOP Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration> .

From: [Wilburn, Tammie - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: RE: List of Certifiers contacted for Turkish Imports
Date: Tuesday, November 29, 2016 1:05:15 PM

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

From: Mann, Renee - AMS
Sent: Tuesday, November 29, 2016 12:57 PM
To: Wilburn, Tammie - AMS
Subject: RE: List of Certifiers contacted for Turkish Imports

Hi Tammie:

Do you know if the list of certifiers below would be any smaller if we only searched for certifiers who certify handlers (not producers) of corn? Miles wants us to limit our letter to *handlers*.

Also, I have some questions for you about the list of countries you searched in... do you have some time early this afternoon to chat?

Thanks,
Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Wilburn, Tammie - AMS
Sent: Tuesday, November 22, 2016 3:16 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>
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From: [Courtney, Cheri - AMS](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Mann, Renee - AMS](#); [Holmes, Vella - AMS](#)
Subject: RE: List of Certifiers contacted for Turkish Imports
Date: Wednesday, November 23, 2016 9:14:52 AM

That is great news Tammy!

Cheri

From: Wilburn, Tammie - AMS
Sent: Tuesday, November 22, 2016 3:36 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>
Subject: RE: List of Certifiers contacted for Turkish Imports

Oh just a heads up, (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]

Tammie

From: Wilburn, Tammie - AMS
Sent: Tuesday, November 22, 2016 3:16 PM
To: Courtney, Cheri - AMS
Cc: Mann, Renee - AMS; Holmes, Vella - AMS
Subject: List of Certifiers contacted for Turkish Imports

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From: [Wilburn, Tammie - AMS](#)
To: [Mann, Renee - AMS](#); [Michael, Matthew - AMS](#); [Holmes, Vella - AMS](#)
Cc: [Courtney, Cheri - AMS](#)
Subject: RE: thank you for joining us on November 15 at the Pre-NOSB meeting
Date: Monday, November 14, 2016 11:50:26 AM

Hi Renee-

(b) (5). And, it's at such an early stage that there's not much to report.

Thanks,
TW

From: Mann, Renee - AMS
Sent: Monday, November 14, 2016 11:28 AM
To: Michael, Matthew - AMS; Holmes, Vella - AMS; Wilburn, Tammie - AMS
Cc: Courtney, Cheri - AMS
Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting
Hi Tammie:

I am preparing talking points for Miles (under deadline today) in preparation for his discussion with the National Organic Coalition.

NOC asked about how NOP is addressing the issue of imports from Turkey. (b) (5)

Thanks,
Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Courtney, Cheri - AMS
Sent: Wednesday, November 09, 2016 3:54 PM
To: Mann, Renee - AMS <Renee.Mann@ams.usda.gov>
Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting
Renee, since you work on both of these issues, please formulate talking points by COB Monday.
Thanks

Cheri

From: McEvoy, Miles - AMS
Sent: Tuesday, November 08, 2016 5:04 AM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>; Lewis, Paul I - AMS <Paull.Lewis@ams.usda.gov>; Gebault King, ReneeA - AMS <ReneeA.GebaultKing@ams.usda.gov>
Subject: FW: thank you for joining us on November 15 at the Pre-NOSB meeting
Please prepare talking points for these questions as they are under AIA responsibilities. Thanks.

From: Abby Youngblood [<mailto:abby@nationalorganiccoalition.org>]

Sent: Monday, November 07, 2016 4:52 PM
To: McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>

Cc: (b) (6)

Subject: thank you for joining us on November 15 at the Pre-NOSB meeting

Dear Miles,

Thank you for joining us at our Pre-NOSB meeting next week on Tuesday the 15th. I am writing to

confirm that we have you scheduled to take part from 2:30 to 3:30. Are there others from USDA who will be able to join us?

We are planning on a Q&A format, similar to the format we've had during the past several meetings. Two of the topics we would like to discuss are outlined at the end of this message. I will be in touch very shortly with one or two additional topics. During the meeting, we would like to present each of these topics to you, hear your response and have time for some discussion. Here is the general format we have in mind:

- 5 min for opening remarks from you
- 3 min or less for NOC member to present topic/question
- 4 to 5 min for your response
- 10 min for discussion

If we spend about 15 to 20 minutes on each question, we should be able to finish in the time allotted.

We have approximately 50 people planning to attend, including about 20 NOC members, as well as 30 others, including farmers, NOSB members, certifiers, animal welfare groups, and organic industry members.

We appreciate your dedication to organic and your engagement with NOC and others during the meeting. Please do not hesitate to let me know if you have questions.

Best Regards,
Abby and Steve

1. QUESTION ON ORGANIC SEED

While the allowance for the use of non-organic seed in organic production is important for growers who lack access to appropriate organic seed, the organic seed requirement is inconsistently enforced. Many would like to see the NOP do more through guidance and regular trainings to create incentives for farms to use more organic seed and to establish a framework for continuous improvement in the use of organic seed.

How can this guidance be strengthened and what else can the NOP do to support increased use of organic seed? How will the NOP support tracking organic seed availability by crop type and region on an annual basis?

2. QUESTION ON ORGANIC IMPORTS

Over the past few years, there has been a dramatic increase in imports of organic commodities, especially grains. A key area of concern for U.S. organic grain growers is whether these increased imports present an opportunity for fraudulently labeled organic products to enter the United States, undermining the opportunity for U.S. producers to get a fair price in the market. Long international supply chains may increase the opportunities for fraud due to breaks in the chain of recordkeeping, organic certification and verification that the USDA organic seal is built upon. The rise of imports from Turkey especially raises concern and one Turkish organic certifier, ETKO, has been decertified by the EU.

The NOP took the step of reminding importers of handling regulations on July 13, 2016, but this action is not enough to address the potential for fraud.

What plans does the NOP have to address this issue? Will the NOP require importers to be certified by an NOP accredited certifier going forward? What other systems will the NOP put in place to ensure the integrity of shipments of grains and other commodities?

--

Abby Youngblood

Executive Director

National Organic Coalition

Abby@NationalOrganicCoalition.org

Cell: (b) (6)

www.NationalOrganicCoalition.org

Twitter: @NationalOrganic

Facebook: Facebook.com/NationalOrganicCoalition

From: Penelope.Zuck@ams.usda.gov on behalf of [Zuck Penelope - AMS ma@etko.org](#)
To: [ma@etko.org](#)
Cc: [AMS - AIAinbox](#); [Mann Renee - AMS](#); [Yang RobertH - AMS](#)
Subject: Registered: Notice of Non-compliance - Onsite Assessment
Date: Wednesday, May 13, 2015 2:22:33 PM
Attachments: [image001.png](#)
[NP4132LCA ETKO NoNC.pdf](#)
[NP4132LCA ETKO NoNC Report.pdf](#)



This is a Registered Email® message from **Zuck Penelope - AMS**.

Dear Dr. Mustafa Akyuz,

Attached to this email is the NOP Notice of Noncompliance including the findings of the Ecological Farming Control Organization audit conducted on May 12-16, 2014. Corrective actions are due within 30 days of receipt of this notice.

A copy of the assessment report, NP4132LCA, is attached for your reference.

If you have questions on this notice, please do not hesitate to contact your Accreditation Manager, Robert Yang, at 202-690-4540 or RobertH.Yang@ams.usda.gov.

Best regards,

Penny



Penny Zuck | USDA-National Organic Program | Accreditation Manager |

USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250

☎ 202.260.9444 | Fax 202.205.7808 | ✉ Penelope.Zuck@ams.usda.gov

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1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOTICE OF NONCOMPLIANCE

MAY 13 2015

Dr. Mustafa Akyuz
Ecological Farming Control Organization
160 Sk. No. 13/7
35040 Bornova – Izmir
Turkey

Dear Dr. Akyuz:

On May 12-16, 2014, a representative of the United States Department of Agriculture (USDA), National Organic Program (NOP), completed an onsite audit of the Ecological Farming Controlling Organization's (ETKO) organic certification program as part of its USDA Renewal Accreditation Assessment. On April 29, 2015 the NOP reviewed the results of the onsite audit to determine ETKO's compliance to the USDA organic regulations. A copy of the assessment report, NP4132LCA, is enclosed for your reference.

As the report indicates, 24 corrective actions for prior noncompliances (NP719900A.NC3, NC5, NC6; NP805000A.NC1, NC2; and NP9222ZZA.NC1-NC5, NC7-NC20) were cleared and determined to be implemented and effective. One noncompliance, NP9222ZZA.NC6, was withdrawn.

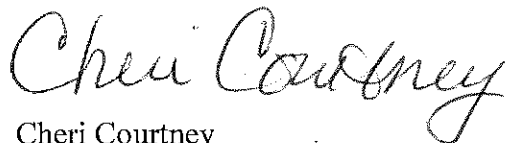
One noncompliance, NP9222ZZA.NC21, remains outstanding from your previous audit. Six new noncompliances (NP4132LCA.NC1 – NC6) were findings identified during the onsite audit and determined to be noncompliances. Please submit proposed corrective actions for all outstanding and new noncompliances to the AIAInbox@ams.usda.gov within 30 days from the date of this Notice indicating how the noncompliances will be corrected. The proposed corrective actions must also indicate how the ETKO management system will be modified to prevent future noncompliances.

Please refer to NOP 2608, Responding to Noncompliances, for further instructions on how to respond to noncompliances. Failure to promptly resolve outstanding noncompliances may result in proposed suspension or revocation of your USDA organic accreditation.

Page 2

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

Sincerely,

A handwritten signature in cursive script that reads "Cheri Courtney".

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

Enclosure

cc: AIA Inbox

NATIONAL ORGANIC PROGRAM: NONCOMPLIANCE REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) received Ecological Farming Control Organization’s (ETKO) renewal application to maintain its U.S. Department of Agriculture (USDA) National Organic Program accreditation in June 2012. The NOP has reviewed ETKO’s application, conducted an onsite audit, and reviewed the audit report to determine ETKO’s capability to operate as a USDA accredited certifier.

GENERAL INFORMATION

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

Organizational Structure:

The Ecological Farming Controlling Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification for ETKO is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities.

ETKO was initially accredited as a certifying agent on January 22, 2003 to the USDA National Organic Program (NOP) for crops, wild crops, and handling. ETKO currently certifies operations

to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine. As of May 2014, ETKO's NOP client list had 40 certified operations with 22 crops, 3 wild crops, and 39 handling operations. ETKO certifies to the Turkish Organic Standard under the legal authority of the Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and Coordination Council (TURKAK). ETKO is also accredited by TURKAK to perform conformity assessments for Turkey's Good Agricultural Practices (GAP). ETKO is accredited to ISO 17065 by the International Organic Accreditation Service (IOAS) in the areas of agricultural production, processing and imports of organic agricultural products according to the EEC, GlobalGap, and the Global Organic Textile Standard (GOTS). ETKO is accredited to conduct Canadian Organic Regime (COR) certification.

ETKO employees 22 staff members that are involved in USDA organic certification. The staff consists of five administrative personnel and 17 technical personnel which also conduct inspections. No contract inspectors are used.

Certification Process:

Requests for certification are reviewed by the Managing Director (MD) and an information packet is provided by e-mail or a hard copy with information on the certification process, fee structure, USDA organic regulations, and a standard application document. The initial compliance review for new applicants is always conducted by a reviewer. Once the applicant appears to comply, an inspector is assigned based on region, experience, and availability. When the inspection is completed, a reviewer then evaluates the inspection results and a certification decision is made by the Organic Certifier position.

The continuing certification procedure is similar to that of initial applicants. For continuing certified operations, an annual production or handling update is received by ETKO on or before the anniversary date of the operation. A review is conducted by a reviewer or the assigned inspector. Inspectors are then assigned according to region, experience, and availability. Certification decisions are made by the Organic Certifier position.

The Turkish National Organic Standard does not permit grower group certification; therefore, all production and handling units must receive external inspections. However, there are four operations identified as grower groups in Turkey (mainly fruits, eg. figs, raisins, etc...) and four in foreign countries. ETKO has established certification procedures for grower groups.

Administrative Records and Processes:

ETKO has an extensive and well-designed, functioning quality system. Procedures and forms are established that cover most certification activities. The quality system documents are in English. Training is conducted annually for all certification staff and appears to be comprehensive and well documented. Key certification staff receive annual external certification training.

Summary of Witness Inspections Conducted:

Three witness audits were conducted during the course of the onsite renewal assessment. All operation locations were within four hours of Izmir, Turkey, ETKO's main office. All inspections were annual inspections and announced. ETKO was planning to conduct additional

inspections when harvest or processing is occurring. One operation was certified organic wild crop and gathering capers. The other two witness operations were certified for crop and handling/processing scopes. The crop operation was identified as a community of fig producers and the processor operation handled a number of fruit products to include the figs from the grower group.

NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether ETKO's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the onsite audit to determine whether noncompliances should be issued to ETKO.

Noncompliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

NP719900A.NC3 – Cleared. 7 CFR §205.501 (a)(1) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part." *Qualifications for the Certification Committee were not submitted for review.*

Corrective Action: Qualifications for the Certification Committee were submitted. The submitted material verified that personnel serving on the Certification Committee have adequate qualifications.

2009 Verification of Corrective Action: Personnel records reviewed during the on-site audit verified personnel had sufficient qualifications as they pertained to experience and education in organic agricultural production and handling methods. However, interviews conducted, records reviewed, and witness inspection findings verified that the training provided to personnel did not include sufficient information on the NOP standards for ETKO to fully comply with and implement the organic certification program in accordance with the NOP Final Rule.

2010 Corrective Action: ETKO conducted training of inspectors, reviewers, and Certification Committee members on November 21, 2009 and March 12-14, 2010 which covered NOP standards, review, inspection, and certification procedures. ETKO has designed a 2010 training plan to ensure periodic training on the NOP is completed. ETKO submitted records of training for all inspectors, reviewers, and Certification Committee members.

2014 Verification of Corrective Action: The new organizational structure of ETKO does not include a Certification Committee. Certification decisions are now determined by the "Organic Certifier." This position is held by one person. Annual certification training is required by all ETKO certification staff according to their Quality System procedures. ETKO provided evidence (Training summary, lesson plans, presentation materials, and training roster) of training conducted during 2013 through May 2014 for the NOP auditor's review.

The training plan for the remainder of 2014 was also provided and determined to be adequate.

NP719900A.NC5 – Cleared. 7 CFR §205.501 (a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” *Conflict of interest disclosure reports were not submitted for the Certification Committee.*

Corrective Action: Signed Conflict of Interest Disclosure Reports for 2006 and 2007 were submitted for the Certification Committee.

2009 Verification of Corrective Action: The Agreement for Confidentiality and Conflict of Interest Disclosure Reports were reviewed for all eight Certification Committee members. On two of the eight reports, the committee members had signed the document but did not provide any responses to the questions on the form. Additionally, there was no Agreement for Confidentiality and Conflict of Interest Disclosure Report for one of the two responsibly connected parties of ETKO.

2010 Corrective Action: ETKO submitted completed Agreement for Confidentiality and Conflict of Interest Disclosure Reports for all Certification Committee members and responsibly connected parties.

2014 Verification of Corrective Action: The Agreement for Confidentiality and Conflict of Interest Disclosure reports are signed annually. All reports were signed on January 2, 2014. The NOP auditor reviewed the personnel files of a reviewer, the decision maker, and an inspector. All reports were complete and no issues were noted.

NP719900A.NC6 – Cleared. 7 CFR §205.662 (b) states, “When a certified operation demonstrates that each noncompliance has been resolved, the certifying agent or the State organic program's governing State official, as applicable, shall send the certified operation a written notification of noncompliance resolution.” *Non-compliance resolutions were not addressed in the policies or procedures submitted.*

Corrective Action: ETKO has submitted a template of the non-compliance resolution.

2009 Verification of Corrective Action: ETKO has the template letter of non-compliance as part of their quality management documentation; however, they have not implemented its use and the inspector, not ETKO, is documenting corrective actions and resolution of non-compliances using ETKO’s Non-Conformity Report.

2010 Corrective Action: ETKO revised GP 18, section 5.24 to address the handling of non-compliances. ETKO has implemented the use of the non-compliance letter and submitted example of non-compliance letters.

2014 Verification of Corrective Action: Procedures for issuing a Notice of Noncompliance Resolution is listed in GP 18, section 5.25.1. The Notice of Noncompliance Resolution template was revised in 2012 and is compliant. The NOP auditor reviewed records of four noncompliance notifications that were issued. The corrective actions were accepted and ETKO issued a Notice of Resolution to the operations.

NP805000A.NC1 – Cleared. 7 CFR §205.201 (a) states, “The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.” *The organic system plans for the files submitted do not contain all of the information required in this section. The plans are designed with questions requiring a yes or no answer which does not give any detail as to how the applicant’s operation complies with the NOP Final Rule.*

Corrective Action: Operators were requested to update the Organic System Plans. Organic System Plans for all NOP certified operations were submitted. They now contain information necessary to determine compliance to the NOP Final Rule.

2009 Verification of Corrective Action: In three of four files reviewed there were deficiencies identified with the organic system plans (OSP). Two of the files were the same certified operations for which the original non-compliance was identified and were also the selected witness inspections. The on-site review of files, interviews, and observations during the witness inspections verified the OSPs were not in compliance.

1. *The wild crop Organic System Plan (OSP) did not adequately address requirements for recordkeeping, designated harvest areas and buffers zone.*
2. *The OSP for the producer witness inspection did not adequately address requirements for the description of recordkeeping, buffer zone requirements, soil fertility and crop nutrient management, and input use.*
3. *The OSP for the processor witness inspection had insufficient information to address the requirements for the monitoring and frequencies to be performed and maintained to verify the plan is implemented. The OSP did not contain documented procedures of the measures for preventing the commingling of organic and nonorganic products. The processor was not maintaining production, cleaning, or shipment records. The OSP did not identify the use of “organic” vegetable oil in the equipment used for processing the organic raisins.*
4. *The OSP for the processor/producer did not identify the use of lime sulfur for pest prevention at the raisin storage depot prior to shipment to the processor.*
5. *Overall, OSP’s did not meet the requirements for compliance to this clause.*

2010 Corrective Action: ETKO issued a notification of non-compliances to the operations and ultimately suspended the operations. ETKO revised their OSP for wild crop, producers, and processors to emphasize the requirement to fully address all requirements. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which addressed the need for fully completed OSPs.

2014 Verification of Corrective Action: The revised Organic Compliance Plans (OCPs) for the wild crop and handler witness audits were in use. The NOP auditor reviewed the OCPs and determined that they were compliant.

NP80500A.NC2 – Cleared. 7 CFR §205.402 (a) states, “Upon acceptance of an application for certification, a certifying agent must: (2) Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part.” *The organic system plans for the files submitted do not contain all of the information required in NOP §205.201. Due to the lack of the required information it would not be possible to make an accurate determination that the organic system plan complies with the requirements of this section.*

Corrective Action: Operators were requested to update the Organic System Plans. Organic System Plans for all NOP certified operations were submitted. They now contain information necessary to determine compliance to the NOP Final Rule.

2009 Verification of Corrective Action: The on-site review of files, interviews, and observations during the witness inspections verified that the OSPs had inadequate information to determine compliance to the NOP Final Rule and certified operations were not in compliance with the NOP Final Rule (see NP80500A.NC1 above).

2010 Corrective Action: ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which addressed the need for fully completed OSPs. ETKO submitted a completed OSP review documenting that the ETKO reviewers were requiring adequate information.

2014 Verification of Corrective Action: OCPs reviewed by the auditor showed that there was sufficient detail and where there was not enough detail, the inspectors would ask the operations to provide the additional information by updating the OCP onsite or submitting it to the ETKO office.

NP922ZZA.NC1 – Cleared. 7 CFR §205.405(a) states, “When the certifying agent has reason to believe, based on a review of the information specified in §205.402 or §205.404, that an applicant for certification is not able to comply or is not in compliance with the requirements of this part, the certifying agent must provide a written notification of non-compliance to the applicant.” 7 CFR §205.406(c) states, “If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662.” *ETKO as a certifying agent is not making a determination of compliance or issuing a written notification of non-compliance based on a review of the on-site inspection findings. ETKO’s inspectors are issuing non-compliances directly to the applicants or certified operations at the time of inspection using their Non-Conformity Report and also reviewing and approving the corrective actions for identified non-*

compliances. ETKO's Certification Committee does not review or make a determination of non-compliances and all non-compliances identified by the inspector must be resolved prior to forwarding the file to the committee.

Corrective Action: ETKO revised General Procedure 18 (GP 18) in sections 5.7, 5.22, and 5.24 to require that the Certification Committee be responsible for providing notification of non-compliance and for the resolution of non-compliance. The revised procedures specifically state that inspectors are not issuing non-compliances directly to the applicants or certified operations.

2014 Verification of Corrective Action: Notifications of minor issues and non-compliances are issued by ETKO. The NOP auditor noted no issues with ETKO's process of issuing notifications.

NP9222ZZA.NC2 – Cleared. 7 CFR §205.406(a)(1-4) states, “To continue certification, a certified operation must annually...submit the following information, as applicable, to the certifying agent:...” 7 CFR §205.662(a) states, “*Notification.* When an inspection, review, or investigation of a certified operation by a certifying agent...reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.” *ETKO is not issuing a notification of noncompliance to certified operations that do not annually submit the information required in §205.406(a)(1-4).*

Corrective Action: ETKO revised GP 18 in sections 5.23 and 5.24 to require that a notification of non-compliance be sent to certified operations that do not submit the required annual update.

2014 Verification of Corrective Action: All files reviewed by the NOP auditor indicated that operations were submitting their annual updates in a timely manner.

NP9222ZZA.NC3 – Cleared. 7 CFR §205.501(11)(vi) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Ensuring that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection.” *ETKO's head inspector or the individual inspectors are conducting the inspections and essentially making the certification decision based on the fact that no files are forwarded to the certification committee until all non-compliances identified by the inspector have been addressed by the clients and corrective actions reviewed and approved by the inspector or head inspector. No files with outstanding non-compliances are sent forward for review by the Certification Committee.*

Corrective Action: ETKO revised General Procedure 18 (GP 18) in section 5.24 to require that the Certification Committee be responsible for making the certification decision, including review and resolution of non-compliances, and that the head inspector and inspectors not have any responsibility or authority for these activities.

2014 Verification of Corrective Action: All decisions are now made by the Organic Certifier and recorded on form: GP 13 F 01, Certification Proposal. No issues noted by the NOP auditor.

NP9222ZZA.NC4 – Cleared. 7 CFR §205.662(a-c) states, “When an inspection, review, or investigation of a certified operation by a certifying agent... reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation...” NOP §205.404(c) states, “Once certified, production or handling

operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program's governing State official, or the Administrator." *ETKO is not requiring clients to notify them when they want to surrender their certification and is issuing letters of surrender to the clients informing them their NOP certificate was surrendered because they did not re-apply for NOP Certification and they cannot use their NOP certificate and must return it. ETKO has "surrendered" the certification of four of their fifteen currently certified operations during years the clients chose not to re-apply for certification and then re-certified them in subsequent years when they re-applied. ETKO also "surrendered" the certification of sixteen additional clients that did not ever re-apply for certification and are no longer listed as certified operations.*

Corrective Action: ETKO revised GP 15 in section 5.4 to require clients to inform ETKO of their decision to surrender their certification and to return the original certificate. The revised procedure also requires ETKO to contact clients that have not submitted updates to determine if they want to surrender.

2014 Verification of Corrective Action: The NOP auditor reviewed two operation files where certification was surrendered and no issues were noted.

NP9222ZZA.NC5 – Cleared. 7 CFR §205.404(b)(2) states, "The certifying agent must issue a certificate of organic compliance to the certified operation which specifies the: effective date of certification. *The effective date of certification was not included on the certificates for 2 of 4 files reviewed.*

Corrective Action: ETKO revised their template certificates to include the effective date of certification. ETKO reviewed their files and issued revised certificates with the effective date of certification for five certified operations.

2014 Verification of Corrective Action: All certificates reviewed by the NOP auditor displayed an effective date.

NP9222ZZA.NC6 – Withdrawn. ETKO's general procedure GP 18, Section 5.2.2 Review of Application, specifies that the application review is conducted by a competent inspector assigned by ETKO. *The Managing Director is conducting all of the initial application reviews and prior to 2009 was also conducting the annual update reviews; however, this responsibility is not identified in ETKO's procedures.*

Corrective Action: ETKO revised GP 18, Section 5.2.2 Review of Application to specify that the application review is conducted by a competent person assigned by ETKO. The competent person may be the Managing Director or other review staff.

2014 Verification of Corrective Action: This noncompliance did not cite the USDA organic regulations and does not appear to be in violation of the regulations. Interviews of ETKO personnel and a review of the operation files indicate that certification reviews are conducted by someone other than the certification decision maker. Therefore, the NOP withdrew this noncompliance.

NP9222ZZA.NC7 – Cleared. 7 CFR §205.501(a)(16) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Charge applicants for certification and certified production and handling operations only those fees and charges for

certification activities that it has filed with the administrator.” *Fees charged and described on the Cost Estimate and Invoice as “Follow-up, Certification: NOP ETKO Staff” are not included on the submitted fee schedule (TI 14). On all three files reviewed for fees charged to clients all three clients were not charged in accordance with the fee schedule. All three clients were undercharged based on the number of inspectors and days taken for the certification which is the method utilized by ETKO to determine the certification fees to be charged.*

Corrective Action: ETKO revised their fee schedule (TI 14) to match the fees charged and described in the Cost Estimate and Invoice.

2014 Verification of Corrective Action: Interviews with ETKO personnel and certified operators in addition to operation file review indicated that estimated fees are provided to applicants and continuing certified operations and calculated according to the fee schedule.

NP9222ZZA.NC8 – Cleared. 7 CFR §205.642 states, “Fees charged by a certifying agent must be reasonable... The certifying agent shall provide each applicant with an estimate of the total cost of certification and estimate of the annual cost of updating the certification... The certifying agent may set the nonrefundable portion of certification fees; however, the nonrefundable portion of certification fees must be explained in the fee schedule.” *Nonrefundable fees are explained in the procedures but not in the fee schedule.*

Corrective Action: ETKO revised their fee schedule (TI 14) to explain nonrefundable fees.

2014 Verification of Corrective Action: ETKO lists nonrefundable fees in the current fee schedule.

NP9222ZZA.NC9 – Cleared. 7 CFR §205.501(a)(7) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have an annual program review of its certification activities conducted by the certifying agent’s staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measure to correct any non-compliances with the Act and the regulations in this part that are identified in the evaluation.” *ETKO’s annual program review is not addressing all certification activities for the NOP. The 2008 internal audit used for the annual program review only reviewed EU files. The 2009 internal audit included NOP files; however, the 2009 annual program review had not been completed so it was not possible to verify the information to be reviewed.*

Corrective Action: ETKO revised TI 30 NOP Accreditation Requirements and SP 03 Management Review procedure to ensure the annual program review addresses all certification activities for the NOP.

2014 Verification of Corrective Action: Management review report was completed on December 28, 2013 and included in ETKO’s annual report acknowledged by the NOP in March 2014.

NP9222ZZA.NC10 – Cleared. 7 CFR §205.207(a) states, “A wild crop that is intended to be sold, labeled, or represented as organic must be harvested from a designated area...” NOP §205.202 states, “Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as organic must: (c) Have distinct, defined boundaries and buffer zones...” *The wild crop witness inspection operation did not have maps or description designating the harvest area or identifying the buffer zones.*

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspend the operation. ETKO revised their wild collection procedure (TI 20) to more specifically require maps or a description of designated harvest areas and identification of buffer zones. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010.

2014 Verification of Corrective Action: During a witness audit of a wild crop inspection, the OCP maps of the three gathering areas indicated defined boundaries.

NP9222ZZA.NC11 – Cleared. 7 CFR §205.307(b) states, “Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the lot number of the product if applicable.” The clients organic system plan (Section A16.3 Collection Activities) stated the main wild crop collector stores the product in a barrel labeled as organic. *A barrel of capers at the wild crop collection depot did not have any labels or identification; although, the head collector stated it was organic.*

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspend the operation. ETKO revised the GP 18 procedure and the GP 18 F01-02 forms to ensure adequate labels and identification of organic product during inspections. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action: All wholesale containers inspected and observed during the witness audits had lot numbers on labels.

NP9222ZZA.NC12 – Cleared. 7 CFR §205.103(b)(2)(4) states, “(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are... (b) Such records must: (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited; (4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.” *The operators for the wild crop, crop, and processing witness inspections did not maintain sufficient records to comply with the requirements.*

Corrective Action: ETKO issued a notification of non-compliance to the operations and ultimately suspended the operations. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures, including the necessity of maintaining sufficient records.

2014 Verification of Corrective Action: All the operations observed during witness audits had sufficient records for the inspections to be fully conducted.

NP9222ZZA.NC13 – Cleared. 7 CFR §205.403(c)(1) – (3) states, “The on-site inspection of an operation must verify: (1) the operation’s compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which...”

1. *During the inspection of the wild crop operation, the inspector did not reference the organic system plan during the inspection, did not physically verify all buffer*

- areas or inquire about potential areas of contamination, and did not identify a non-labeled barrel (containing organic product) as a non-compliance.*
2. *During the producer witness inspection, the inspector did not inspect the storage unit where raisins are stored prior to shipment to the processor because there was nothing currently in storage. The inspector did not inquire about the use of lime sulfur for pest prevention at the storage depot; although, the product had recently been used by the certified operation and a bag was available for review.*
 3. *During the producer witness inspection, the inspector did not fully inspect the chemical storage area of the producer and did not inquire about the Valagro NPK 20.20.20 fertilizer, Cropex, and Sweet K-30 (water soluble potassium oxide) product in the storage area which were being used for conventional crops.*

Corrective Action: ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures. ETKO increased monitoring activities of inspectors in 2009 and identified that during the 2010 inspection cycle all inspectors will be observed conducting NOP inspections to ensure compliance. ETKO submitted Inspector Monitoring Reports from the end of 2009.

2014 Verification of Corrective Action: ETKO continues to conduct annual training and field monitoring of inspectors. During the witness audits, inspectors were conducting thorough inspections with only minor issues observed and noted by the NOP auditor.

NP9222ZZA.NC14 – Cleared. 7 CFR §205.202(c) states, “Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as ‘organic’ must: (c) Have distinct, defined boundaries and buffer zones...” *The crop witness inspection locations did not have maps or written descriptions to identify the boundaries and the buffer zones.*

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspended the operations. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures. ETKO revised GP 18 to specify that NOP applicants and clients must submit maps with defined boundaries and buffer zones, as applicable.

2014 Verification of Corrective Action: During the witness inspections all OCPs were complete with land or facility maps.

NP9222ZZA.NC15 – Cleared. 7 CFR §205.203(a) states, “The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological conditions of soil...” *The OSP for the producer witness inspection stated they did practice cultivation methods to maintain or improve; however, five of the seven producers visited were leaving the fields unattended with little or no tillage or cultivation practices and only the application of inputs for pest or disease prevention and treatment.*

Corrective Action: ETKO issued a notification of non-compliance to the operation and ultimately suspended the operations. ETKO revised GP 18 and GP 18 F 02 Agriculture Plan to address the issue of unattended fields. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action (May 2014): Witness audits of several crop operations

revealed that producers were actively farming the sites and improving soil health.

NP9222ZZA.NC16 – Cleared. 7 CFR §205.501(a)(8) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part.” *The wild crop, crop, and processor witness inspection clients and their subcontracted units did not have adequate knowledge of the NOP requirements to enable them to comply with the Act. The wild crop witness inspection client purchasing representative and person responsible for training the head collectors stated he had not seen the NOP Rule and did not have any knowledge of the NOP Rule.*

Corrective Action: ETKO issued a notification of non-compliance to the operations and ultimately suspended the operations. ETKO revised GP 18 to emphasize the necessity of adequate knowledge of the NOP requirements. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action: ETKO is requiring certified operations to train and monitor individuals involved in organic production and handling activities. All operations observed and operation files reviewed indicated that training was occurring and recorded.

NP9222ZZA.NC17 – Cleared. 7 CFR §205.403 (a)(1) states, “A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each...” and ETKO *Technical Instruction TI 20 Certification of Wild Collection*, Rev Nr. 2, 20.10.2008, section 5.4 states “ETKO inspectors will visit a certain number of collecting sites, according to the risk factors of the collection system; minimum site visit must be 5 and according to inspector’s decision: This number can be increased up to 10 collection sites.” *The ETKO instructions and procedures allow for a sampling of certified operations to be inspected as opposed to all certified sites being inspected annually and thereafter as required. These operations are not certified as grower groups and would not qualify as grower groups (don’t have to sell all organic harvest through the group). The wild crop and producer witness inspections along with interviews conducted, and records reviewed verified that not all sites are inspected as required.*

Corrective Action: ETKO revised TI 20 Certification of Wild Collection, section 5.4 to distinguish between group certification with an internal control system and individual collection operations without an internal control system. The individual collection operations have multiple collectors; however, they are not considered grower groups and according to the revised procedure the on-site inspection will include all collectors and all locations.

2014 Verification of Corrective Action: All certified and applicant locations require annual on-site inspections according to Turkish organic standards. During the witness audits, all fields were inspected by the inspectors. No issues noted by the NOP auditor.

NP9222ZZA.NC18 – Cleared. 7 CFR §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary” and

the 2002 NOSB Recommendation states, “The certifying agent shall have policies and procedures for determining how many growers must receive an annual inspection by the certifying agent.” *ETKO Procedure OP 02 Certification of Grower Groups is just a copy of the requirements for grower groups from the NOSB Recommendation. The procedure does not provide any actual information on how many growers will receive an annual inspection from the ETKO inspector.*

Corrective Action: ETKO revised procedure OP 02 Certification of Grower Groups to define the risk categories of normal, medium, and high, and specify the number of members to be evaluated for each category. The total number for each category is based on increasing multiplication factors (1, 1.2, 1.4) of the square root of the total number of farmers with a mandatory minimum number of members that must be evaluated.

2014 Verification of Corrective Action: ETKO has a method (EU guidance) to calculate the number of external inspections of grower groups. All grower group files reviewed indicate that ETKO has properly implemented this procedure.

NP9222ZZA.NC19 – Cleared. 7 CFR §205.403(b)(2) states, “All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present...” *Five of seven farms inspected did not have the farmer that manages the operation present for the inspection. The company representative responsible for purchasing the product from the farmers was present and he is also a farmer of a certified operation; however, he was only aware of the general production practices and not the specific practices of each operation. An interview with one of the farmers was conducted off-site; however, he was not present during the review at his field.*

Corrective Action: ETKO revised GP 18, section 5.7 to specify that the NOP inspection cannot be carried out without the presence of an authorized and knowledgeable representative. ETKO informed NOP clients to provide NOP training to their responsible staff and producers. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards, review, inspection, and certification procedures.

2014 Verification of Corrective Action: All producers and operators were present during the witness audits. No issues noted by the NOP auditor.

NP9222ZZA.NC20 – Cleared. 7 CFR §205.301(a) states, “A raw or processed agricultural product sold, labeled, or represented as “100 percent organic” must contain (by weight or fluid volume, excluding water and salt) 100 percent organically produced ingredients.” *The crop and processing witness inspection client’s organic certificate and organic system plan identifies the processed product (raisins) as 100 percent organic, but a potassium bicarbonate solution is being added to the grapes prior to on-farm drying to speed up the drying process and facilitate color development. One additional file reviewed identified the use of enzymes and non-certified pectin in a product identified as 100 percent organic.*

Corrective Action: ETKO reviewed the files and revised the categories on the certificates to organic. ETKO conducted training of inspectors and reviewers on November 21, 2009 and March 12-14, 2010 which covered the NOP standards and labeling requirements.

2014 Verification of Corrective Action: During the review of operation files and certificates, the NOP auditor did not note any issues of concern with ETKO’s classification

of organic products.

NP9222ZZA.NC21 – Outstanding. 7 CFR §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.” *Interviews conducted, records reviewed, and witness inspections observed, verified a general lack of understanding of the NOP standards. While personnel had sufficient experience and education in organic agricultural production and handling practices, there was insufficient understanding on the application of the NOP standards as evidenced by inadequate information in the approved organic compliance (system) plans with no issues of concern or non-compliances being identified over multiple years of certification. The primary Certification Committee (CC) member with expertise in crops was not familiar with basic requirements such as the 90/120 day rule for raw manure application, did not know where to reference in the NOP Rule to determine if an input is permitted, and did not know when commercially available seeds and planting stock could be used. Additionally, while it was stated that the Certification Committee (CC) had received training there were no training records for any of the CC members prior to 2009.*

Corrective Action: ETKO conducted training of inspectors, reviewers, and Certification Committee members on November 21, 2009 and March 12-14, 2010 which covered NOP standards, review, inspection, and certification procedures. ETKO has designed a 2010 training plan to ensure periodic training on the NOP is completed. ETKO submitted records of training for all inspectors, reviewers, and Certification Committee members.

2014 Verification of Corrective Action: The NOP auditor found the following issues of concern that demonstrated an insufficient understanding of the USDA organic regulations and NOP policies:

1. Label review – the label review checklist did not include USDA organic regulation label requirements to be verified.
2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
3. OCP templates state the incorrect USDA organic regulations.
4. Inspectors are using outdated USDA organic regulations (2010).
5. Inspectors and reviewers not readily able to look up regulations.
6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.
7. Several crop operation OCPs reviewed by the NOP auditor indicated “Not Applicable” for Crop Rotation practice standard (205.205).
8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

Noncompliances Identified during the Current Assessment

NP4132LCA.NC1 – 7 CFR §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.” Furthermore, NOP 4009, Instruction – Who Needs to be Certified?, states “The OFPA requires

that agricultural products sold or labeled as organically produced must be produced only on certified farms and handled only through certified handling operations (see 7 USC § 6506(a)(1)). The USDA organic regulations reiterate these requirements (see 7 CFR 205.100.)”

Comments: *ETKO certifies projects that contain uncertified operations (i.e. contractors) that produce or handle organic products that are not certified entities.*

NP4132LCA.NC2 – 7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *Certificates do not adequately indicate the certification scopes of Crop, Wild Crop, and Handling/Processing.*

NP4132LCA.NC3 – 7 CFR §205.662(c) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent... shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance... The notification of proposed suspension or revocation of certification shall state: (1) The reasons for the proposed suspension or revocation; (2) The proposed effective date of such suspension or revocation; (3) The impact of a suspension or revocation on future eligibility for certification; and (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.”

Comments: *ETKO suspended an operation without issuing a Notice of Proposed Suspension. The same operation after receiving the Notice of Suspension effective for 30 days was issued a Notice of Proposed Revocation and subsequently a Notice of Revocation. The sequence of issued notices and contents of the notifications demonstrate that ETKO does not fully comprehend the process of issuing notifications for noncompliances and adverse actions.*

NP4132LCA.NC4 – 7 CFR §205.403(c) states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations of this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples.”

Comments: *The following issues were identified by the NOP auditor during a review of the operation files and witness audits:*

- 1. Inspectors did not completely verify the information stated in the Organic Compliance Plans. If observations and interviews at the onsite inspection did not align with the Organic Compliance Plan, the inspector failed to state this finding as an issue of concern.*
- 2. ETKO inspectors are responsible for collecting large amounts of information about the operations when the Organic Compliance Plan (OCP) is incomplete or in error. The inspector did not note the finding as an issue of concern, failing to indicate that the OCP is incomplete. The inspector did not record these findings in the inspection report.*

Minor updates or adjustments to the OCP during the onsite inspection is acceptable and can be noted in the inspector's report.

3. *The inspection reports did not include a description and the outcome of the reconciliation activities (e.g. mass balance and audit trail audit) conducted by inspectors.*

NP4132LCA.NC5 - 7 CFR § 205.501(a)(2) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart."

Comments: *During a crop witness audit observation, the NOP auditor noted that the inspector was not equipped and possibly not adequately trained to conduct sampling for pesticide residues. Product samples were collected during the crop inspection; however, the inspector collected the samples with bare hands potential exposing the samples to contamination and jeopardizing sample integrity.*

NP4132LCA.NC6 - 7 CFR § 205.501(a)(21) states "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms or conditions determined by the Administrator to be necessary." NOP Policy Memo (PM) 11-10 (dated 01/21/11) states, "Grower group certification...accredited certifying agents should use the National Organic Standards Board (NOSB) recommendations of October 2002 and November 2008 as the current policies."

Comments: *Grower Groups certified by ETKO do not have documented and functioning Internal Control Systems.*

From: [Zuck, Penelope - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: WTL Status Report - 10/01/2015
Date: Thursday, October 01, 2015 9:46:29 AM
Attachments: [image001.png](#)

Renee,

I did a search for items outstanding in the WTL over 90 days and here is a summary:

1. There are several Annual Reports outstanding (16)
2. Ecocert complaint – in progress (PZ –reassigned from JH)
3. MAFF complaint re: TM-11 (RGK) – last item in chrono log: 08/31 rec'd letter from PCO with responses to questions sent by NOP.
4. Reinstatement Request for Aaron Stoltzfus, Friendly Farms (PCO) – last item in chrono log: 09/02 JL drafted letter to MM for review and cc'd CC, RM, RGK
5. Ecoglobe renewal – in progress (RY)
6. TDA CA Report – in progress (PZ)
7. ETKO CA Report – in progress (PZ)
8. Livestock Grower Group Review project (RGK) – not sure of status
9. Application for Accreditation – IMO Latin America (RGK) – not sure of status

Penny



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From: [Zuck, Penelope - AMS](#)
To: [Mann, Renee - AMS](#)
Subject: WTL Status Report - 12/1/15
Date: Tuesday, December 01, 2015 1:47:08 PM
Attachments: [image001.png](#)

Renee,

The results of outstanding items in WTL over 90 days:

1. There are several Annual Reports outstanding (11)
2. Food Safety CA Report – in progress (PZ)
3. OIA CA Report – in progress (PZ)
4. Ecocert complaint – in progress (PZ)
5. MAFF complaint re: TM-11 – in progress (RGK)
6. Reinstatement Request for Aaron Stoltzfus, Friendly Farms (PCO) – last item in chrono log:
09/02 JL drafted letter to MM for review and cc'd CC, RM, RGK – **Matthew is still working on this?**
7. ETKO CA Report – in progress (PZ)
8. Eco-LOGICA S.A. NC Report – in progress (JL)
9. LETIS S.A. CA Report – last entry in chrono log – 8/26/15 JH emailed RM for guidance on questions. Looks like it was re-assigned to JL in WTL 8/25/15.
10. IMO Latin America application for Accred – notes: 9/11 RGK rec'd updated app and began desk audit.
11. ICEA satellite office CA Report – in progress (JL)
12. OneCert CA Report – in progress (PZ)

Thanks,

Penny



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From: ma@etko.org
To: sm.ms.NOPACAAdverseActions
Cc: (b) (6)
Subject: Notice Resolutions of Non-Compliances
Date: Monday, June 06, 2016 8:34:43 AM
Attachments: [NRONC 3130F-01 AGROS.pdf](#)
[NRONC 3130D-01 AGROS.pdf](#)

Dear Roman

You can find attached Notification Resolution of Non-Compliances.

Best regards,

Mustafa Akyuz
ETKO Turkey
T: +90-232-3397606
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www.etko.org

	Notification of Resolution of Noncompliance 3130D-01 AGROS	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: **Roman Vysochin**

Date: **06.06.2016**

On the date **07.12.2015** ETKO Inspector **(b) (6), (b) (7)(C)** realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **07.12.2015** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **30.04.2016** and subsequently to close the outstanding noncompliances. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to **Mr. Mustafa Akyüz** from ETKO +90-232-3397606 or by email at: ma@etko.org, info@etko.org .

Sincerely

Dr. Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **1**
NC number(s) : **15.1**

- Outstanding noncompliance : **None**
NC number(s) :

Notification of Resolution of Noncompliance 3130D-01 AGROS	Nr	GP 18 F 11
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Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016

Noncompliance :

§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:

(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;

(2) Identification of the product as organic;

(3) Special handling instructions needed to maintain the organic integrity of the product;

(4) The USDA seal;

(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.

(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.

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

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

B2.2: There is no indication on the storages

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

Inspection criteria	NOP reg. ref	205.307a	ETKO rules ref.	834-Article 19, 23, IACB 7.4, 9.1 889-Article 35, IACB 7.5.4 OCP A8.1, B.2.2 and 2.5
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Action taken: **Labels are prepared. Storages are indicated as organic (see pictures). Crops are sold as conventional but sample of label is prepared. Bulk products will be indicated as organic.**

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

Name, Surname and Signature of Appl. Resp.	Roman Vysochin	Date	30.04.2016
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Review Date	02.06.2016	Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>
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Review Comment: **Labels draft was prepared and send to etko for approval. They put indication to the storage as "Organic" Pictures attached. Operator declared that products from 2015 crops sold as conventional, no organic product remained in storages.**

Reviewer name & signature: **Mustafa Akyüz**

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Dear Madam / Sir: **Roman Vysochin**

Date: **06.06.2016**

On the date **07.12.2015** ETKO Inspector **(b) (6), (b) (7)(C)** realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **07.12.2015** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **30.04.2016** and subsequently to close the outstanding noncompliances. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to **Mr. Mustafa Akyüz** from ETKO +90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely

Dr. Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **5**
NC number(s) : **15.1, 2, 3, 4, 5 See below**

- Outstanding noncompliance : **None**
NC number(s) :

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Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>(b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.</p> <p>They have no records about cleaning of storages and trucks.</p>				
Inspection criteria	NOP reg. ref	205.272 (a),	ETKO rules ref.	889-Article 31 IACB 7.5.2 OCP 11.4, 15.1 and 2:
Action taken	Records of storage and trucks cleaning are presented.			
Please identify the supporting documents, if any: Annexes of records				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Records of storage cleaning were provided see Annex 4 and also Transport cleaning register form was prepared for future trade activities. No organic trade was realized in 2015.</p> <p>Reviewer name & signature: Mustafa Akyüz</p>				

Notification of Resolution of Noncompliance 3130D-01 AGROS	Nr	GP 18 F 11
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Noncompliance No	2	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016

Noncompliance :

§§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:

(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;

(2) Identification of the product as organic;

(3) Special handling instructions needed to maintain the organic integrity of the product;

(4) The USDA seal;

(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.

(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.

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

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

Inspection criteria	NOP reg. ref	205.307 (a)	ETKO rules ref.	889-Article 35 IACB 7.5.4
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Action taken **Labels are prepared. Storages are indicated as organic (see pictures). Crops are sold as conventional but sample of label is prepared.**

Please identify the supporting documents, if any: **Annex 1. Storage Pictures.**

Name, Surname and Signature of Appl. Resp.	Roman Vysochin	Date	30.04.2016
Review Date	02.06.2016	Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>

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

Reviewer name & signature: **Mustafa Akyüz**

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Noncompliance No	3	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management</p> <p>There is no enough description about buffer zones and farm neighbors. Buffer zones on the fields map are not clearly indicated.</p>				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	6.5.3 - 834-Article 12.1,
Action taken Maps are prepared.				
Please identify the supporting documents, if any: Annex 2				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Maps were updated and provided to ETKO Annex 2. Evaluation of BZ is done and indications made on the map.</p> <p>Reviewer name & signature:</p>				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016
Noncompliance : 205.403 (c) Verification of information. The on-site inspection of an operation must verify: (1) The operation's compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples. There are no records about trainings personal in organic farming and NOP regulation was not present in the farm.				
Inspection criteria	NOP reg. ref	205.403c1	ETKO rules ref.	889-Article 31 IACB 7.5.2
Action taken NOP regulations were downloaded from USDA AMS webpage. Trainings were done and registers are prepared.				
Please identify the supporting documents, if any: Annexes				
Name, Surname and Signature of Appl. Resp.	Roman Vysochin		Date	30.04.2016
Review Date	02.06.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: NOP regulations are in electronic format in farm. Training registers are presented, but date of training not mentioned, dates to be mentioned for future trainings. Reviewer name & signature: Mustafa Akyüz				

Notification of Resolution of Noncompliance 3130D-01 AGROS	Nr	GP 18 F 11
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Noncompliance No	5	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	07.12.2015
Date of Notification	02.04.2016		Due Date	02.05.2016

§205.204 Seeds and planting stock practice standard.

(a) The producer must use organically grown seeds, annual seedlings, and planting stock: *Except*, That,

(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: *Except*, That, organically produced seed must be used for the production of edible sprouts;

(2) Nonorganically produced seeds and planting stock that have been treated with a substance included on the National List of synthetic substances allowed for use in organic crop production may be used to produce an organic crop when an equivalent organically produced or untreated variety is not commercially available;

(3) Nonorganically produced annual seedlings may be used to produce an organic crop when a temporary variance has been granted in accordance with §205.290(a)(2);

(4) Nonorganically produced planting stock to be used to produce a perennial crop may be sold, labeled, or represented as organically produced only after the planting stock has been maintained under a system of organic management for a period of no less than 1 year; and

(5) **Seeds, annual seedlings, and planting stock treated with prohibited substances may be used to produce an organic crop when the application of the materials is a requirement of Federal or State phytosanitary regulations.**

(b) [Reserved]

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

Inspection criteria	NOP reg. ref	205.204	ETKO rules ref.	834-Article 9, IACB 5.9, 16.4
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Action taken **Vendor declaration for corn is prepared. There were used GMO-free seeds.**

Please identify the supporting documents, if any:

Name, Surname and Signature of Appl. Resp.	Roman Vysochin	Date	30.04.2016
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Review Date	02.06.2016	Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
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Review Comment: **The Vendor declaration for corn was provided to ETKO.**

Reviewer name & signature: **Mustafa Akyüz**

Ref Nr: 20160729

Date: July 29, 2016

Subject: Minor Issues

Süleyman bey

I would like to take your attention to the below mentioned Minor Issues for urgent consideration.

As explained below necessary procedures and/or information must be prepared before the certification decision is taken.

NOP Requirement: **§205.203 Soil fertility and crop nutrient management practice standard.**

- c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances

6.5	Toprak iyileştirme ve koruma planınız var mı ve tatmin edici mi? LÜTFEN TOPRAK İYİLEŞTİRME VE KORUMA PLANINIZI AÇIKLAYINIZ.	Toprağın iyileştirilmesi ve korunması adına yürütülen işlemler şunlardır: Toprak iyileştirme konusunda dökümanite edilmiş bir prosedür, talimat bulunmuyor.
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Issue 1: 6.5 Toprağın patojen, ağır metal ve kimyasal bulaşma kaynaklarından korunması ve toprağın iyileştirilmesi konusunda dökümanite edilmiş bir prosedür, talimat bulunmuyor. There is no procedure how to protect the soil, improve organic matter and to avoid contamination from residues, pathogenic organisms, heavy metals.

NOP Requirement **§205.661 Investigation of certified operations.**

(a) A certifying agent may investigate complaints of noncompliance with the Act or regulations of this part concerning production and handling operations certified as organic by the certifying agent. A certifying agent must notify the Program Manager of all compliance proceedings and actions taken pursuant to this part.

Issue 2: 18.1 Üreticinin şikâyetlerle ilgili bir prosedürü yok, dolayısıyla alınan ve takip edilen bir şikâyet olmamış. Söz konusu olabilecek ürünlerin nasıl ele alınacağı konusu açık değil.

18.1. In case a complaint received from any parties for a specific lot of product, there is no procedure explaining how to act for that product to protect organic integrity

18.1	205.103(b)(4), 205.201(a)(1-6)	Organik yönetmeliklere uyumla ilgili şikâyetleri belgelendirmek ve değerlendirmek için prosedürleriniz var mı? LÜTFEN ŞİKAYET PROSEDÜRÜNÜZÜ AÇIKLAYINIZ.	Üreticinin şikâyetlerle ilgili bir prosedürü yok, dolayısıyla alınan ve takip edilen bir şikâyet olmamış. Söz konusu olabilecek ürünlerin nasıl ele alınacağı konusu açık değil.
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Fatih Aksoy

	Notification of Noncompliance 2044F-01 Arif Gürdal	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: **Arif Gürdal**

Date: **29.07.2016**

On the dates **20.07.2016** ETKO Inspector (b) (6), (b) (7)(C) realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection report dated **20.07.2016**, ETKO determined the outstanding noncompliances in your file / operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **29.08.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Fatih AKSOY** from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely

Enclosure: Inspection report number: **2016.1**

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance	Nr	GP 18 F 10
		Date	15.07.2015
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2044F-01 Arif Gürdal			

Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	20.07.2016
Date of Notification	29.07.2016		Due Date	29.08.2016
<p>Noncompliance :</p> <p>§205.203 Soil fertility and crop nutrient management practice standard.</p> <p>(a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.</p> <p>(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.</p> <p>(c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:</p> <p>(1) Raw animal manure, which must be composted unless it is:</p> <p>(i) Applied to land used for a crop not intended for human consumption;</p> <p>(ii) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or</p> <p>(iii) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;</p> <p>(2) Composted plant and animal materials produced through a process that:</p> <p>(i) Established an initial C:N ratio of between 25:1 and 40:1; and</p> <p>(ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or</p> <p>(iii) Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.</p> <p>(3) Uncomposted plant materials.</p> <p>4.1 Kompostlama tekniği uygun ancak C:N oranı, sıcaklık ve aktarma konusunda kayıt sistemi geliştirilmemiş.</p> <p>Composting techniques appropriate but there is no recording of C:N ratio, heat and turning</p>				
Inspection criteria	NOP reg. ref	205.203c2	ETKO rules ref.	
Action taken:				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Arif Gürdal		Date	27.07.2016
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: ma@etko.org; (b) (6)
Subject: Notification of Non-Compliances- Arif Gurdal 2044F-01
Date: Friday, July 29, 2016 9:39:07 AM
Attachments: [image001.jpg](#)
[NONC 2044F-01 Arif Gurdal.pdf](#)
[Minor Issues- Arif Gurdal.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances and Minor Issues for Arif Gurdal 2044F-01. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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From: [Ceren BAYAZIT](#)
To: (b) (6); sm.ms.NOPACAAdverseActions
Subject: Notification of Resolution of Non-Compliances for Arif Grdal 2044F-01
Date: Thursday, September 01, 2016 9:21:38 AM
Attachments: [image001.jpg](#)
[NRONC 2044F-01 Arif Grdal.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Arif Grdal 2044F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
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		Date	15.07.2015
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Dear Madam / Sir: **Arif Gürdal**

Date: **01.09.2016**

On the date **20.07.2016** ETKO Inspector **(b) (6), (b) (7)(C)** realized **a surveillance inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s).

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance:

NC number(s) : **16.1 See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	20.07.2016
Date of Notification	12.08.2016		Due Date	12.09.2016
Noncompliance : §205.203 Soil fertility and crop nutrient management practice standard. (a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion. (b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials. (c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include: (1) Raw animal manure, which must be composted unless it is: (i) Applied to land used for a crop not intended for human consumption; (ii) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or (iii) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles; (2) Composted plant and animal materials produced through a process that: (i) Established an initial C:N ratio of between 25:1 and 40:1; and (ii) Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or (iii) Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times. (3) Uncomposted plant materials. <b style="color: red;">4.1 Composting techniques are appropriate but there is no record system for C:N ratio, temperature and mixing the compost.				
Inspection criteria	NOP reg. ref	205.203(c)(2)	ETKO rules ref.	205.203(c)(2)
Action taken: <b style="color: green;">The record systems regarding C:N ratio, temperature and mixing are developed as indicated in Annex-1 with a declaration. Please identify the supporting documents, if any: <b style="color: green;">Annex-1 Record System of Composting				
Name, Surname and Signature of Appl. Resp.	Arif Gürdal		Date	
Review Date	11.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: <b style="color: blue;">Annex-1 Record System of Composting is checked. The temperatures and the frequency of mixing the compost are provided in the Table of Compost Measuring. And the C:N ratio values are indicated in the Table of Physical&Chemical Properties of Manure and in the Table of Properness and Properties of Several Organic Substances to be Composted. Their declaration is also provided. Besides, the waste utilization for composting is evaluated.				
Reviewer name & signature: <b style="color: blue;">Fatih Aksoy				

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: **Vyacheslav Belov**

Date: **17.10.2016**

On the dates (**06.09.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized **annual surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **06.10.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.11.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Fatih AKSOY** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr ; info@etko.com.tr

Sincerely

Enclosure: Inspection report number: **3214-2016.ma**

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
		Date	15.07.2015
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Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-9.6	
<input type="checkbox"/> Factors causing risk on the product	<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issues: - Lot nr is not mentioned with B/L and Invoice. - Status of product is not mentioned with B/L</p>					
Inspector Name and signature	(b) (6), (b) (7)(C)		Operator name and signature	Vyacheslav Belov	
Corrective Action Plan by Operator					
Target date	17.11.2016	Operator name and signature	Vyacheslav Belov	Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations					

Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
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Operator unit no.	3214	Unit name	Belagro
Location - Address	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input checked="" type="checkbox"/> Major M2-9.2		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input checked="" type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.</p> <p>Issues: - Label approved after the export, so product transported to US without label</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Vyacheslav Below
Corrective Action Plan by Operator			
Target date	17.11.2016	Operator name and signature	Vyacheslav Below
Actual Completion date			
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations:			

Notification of Noncompliance 3214 Belagro	Nr	GP 18 F 10
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Operator unit no.	3214	Unit name	Belagro
Location - Address	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Prohibited substances	Std or reg. Art. nr. IACB	NCR No 2016.3
Inspection Date	06.10.2016	5.3b,c, 7.2.4a, NOP 205.105.a	
Date of Notification	14.10.2016	Due Date	14.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-8.11	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector				
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.</p> <p>To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues: - TLR Results show 87 substances and NOP 2611.1 Prohibited substances indicates 191 substances so there is big gap of chemicals screened. 104</p>				
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Vyacheslav Belov	
Corrective Action Plan by Operator				
Target date	17.11.2016	Operator name and signature	Vyacheslav Belov	Actual Completion date
Verification of Operator's corrective action and implementation by ETKO				
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval	
Explanations:				

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAverseActions
Cc: Tov-belagro@ukr.net
Subject: Notification of Non-Compliances_ Belagro 3214D-01
Date: Monday, October 17, 2016 3:27:58 AM
Attachments: [image001.jpg](#)
[3214D-01 Belagro NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Belagro 3214D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: (b) (6)
Subject: Notification of Resolution of NonCompliances_ Belagro 3214D-01
Date: Friday, January 20, 2017 7:00:28 AM
Attachments: [image001.jpg](#)
[NRONC 3214D-01 Belagro.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Belagro 3214D-01.
If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.com.tr , **Web:** www.etko.com.tr

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	Notification of Resolution of Noncompliance 3214D-01 Belagro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	1/4

Dear Madam / Sir: **Vyacheslav Belov**

Date: **21.12.2016**

On the dates (**06.10.2016**) ETKO Inspector Mr. **(b) (6), (b) (7)(C)**) realized **annual surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection reports dated **17.10.2016** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by email at: fa@etko.com.tr

Sincerely

Fatih AKSOY

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **3**

NC number(s) : **16.1, 16.2, 16.3 See below forms**

- Outstanding noncompliance : **None**

NC number(s) :

Notification of Resolution of Noncompliance 3214D-01 Belagro	Nr	GP 18 F 11
	Date	15.07.2015
	Rev	00
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Resolved Non-compliances:

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

Initial Inspection	<input type="checkbox"/>	Surveillance Inspection	<input checked="" type="checkbox"/>	Report no	3214-2016.ma
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr.	NCR No
		IACB7.5.2.1d, NOP 205.103b2	2016.1
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-9.6	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issues: - Lot nr is not mentioned with B/L and Invoice. - Status of product is not mentioned with B/L</p>					
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Vyacheslav Belov		
Corrective Action Plan by Operator					
<p>We are aware of the issue and we guarantee compliance of 205.103b. We will prepare trade documents and labels including Status of the product and the lot number clearly. We created instructions for transport of goods in Ukraine and out of Ukraine, where it is mentioned that without reference for status of the product in all documents – not allowed to transport organic products. Instruction is attached.</p>					
Target date	17.11.2016	Operator name and signature	Vyacheslav Belov	Actual Completion date	13.12.2016
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	21.12.2016	ETKO approval
<p>ETKO approval: Fatih Aksoy</p>					
<p>Explanations: Instruction and declaration are satisfactory Annex 4 Declaration</p>					

Notification of Resolution of Noncompliance 3214D-01 Belagro	Nr	GP 18 F 11
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Operator unit no.	3214	Unit name	Belagro
Location - Address	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	06.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input checked="" type="checkbox"/> Major M2-9.2		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input checked="" type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.</p> <p>Issues: - Label approved after the export, so product transported to US without label</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Vyacheslav Belov
Corrective Action Plan by Operator			
From now never products will be transported without label. Please find attached our declaration. Instruction for transporting does not allow to transport any organic products without labels and referring to the status.			
Target date	17.11.2016	Operator name and signature	Vyacheslav Belov
		Actual Completion date	13.12.2016
Verification of Operator's corrective action and implementation by ETKO			
Accepted:	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Date	21.12.2016
		ETKO approval	Fatih Aksoy
Explanations: Declaration provided, satisfactory Annex 3 Instruction for transport			

Notification of Resolution of Noncompliance 3214D-01 Belagro		Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	4/4

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3214-2016.ma
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Subject of nonconformity	Prohibited substances	Std or reg. Art. nr. IACB	NCR No 2016.3
Inspection Date	06.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-8.11	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603; (b) Nonsynthetic substances prohibited in §205.602 or §205.604; (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605; (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606; (e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a); (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and (g) Sewage sludge.</p> <p>Issues: - TLR Results show 87 substances and NOP 2611.1 Prohibited substances indicates 191 substances so there is big gap of chemicals screened. 104</p>					
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Vyacheslav Belov		
Corrective Action Plan by Operator					
We will follow NOP 2611.1 Prohibited substances list and make sure that all substances are covered					
Target date	17.11.2016	Operator name and signature	Vyacheslav Belov	Actual Completion date	13.12.2016
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	21.12.2016	ETKO approval
Fatih Aksoy					
Explanations: Declaration provided, satisfactory, however when analyses done the reports will be verified for compliance. Annex 4 Declaration labelling & analyses					

From: [Ceren B.](#)
To: [sm.ms.NOPACAAverseActions](#); [MUSTAFA AKYUZ](#)
Subject: ETKO- Notification of Non-Compliances for Analyses
Date: Monday, September 26, 2016 9:59:40 AM
Attachments: [NONC 3080F-02 Diana. ANALYSES.pdf](#)
[NONC 3080F-01 Rin Agro. ANALYSES.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-compliances for Analyses for 3080F-02 Diana and 3080F-01 RinAgro.

Best regards,

Ceren Bayazit

	Notification of Noncompliance 3080F-01 Rin Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **26.09.2016**

On the dates **04.08.2016** ETKO Inspector **(b) (6), (b) (7)(C)** realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
2016-20361	Sunflower Plants	3080F-01 Rinagro	Field No (b) (6), (b) (7)(C)	Chlormequat	0,023	None	0.01	Noncompliance
2016-20360	Soybean Plants	3080F-01 Rinagro	Field No (b) (6), (b) (7)(C)	Chlormequat	0,139	None	0,01	Noncompliance

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **26.10.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYUZ** from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance 3080F-01 Rin Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Noncompliances:

Noncompliance No	15.6	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	04.08.2016
Date of Notification	26.09.2016		Due Date	26.10.2016
<p>Noncompliance :</p> <p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues:</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report.</p>				
Inspection criteria	NOP reg. ref	205.105 (a,e)	ETKO rules ref.	5.9
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Okunenko Igor Nicolaevich		Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3080F-02 Diana	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: **Ferens Vasiliy Ivanovich**

Date: **26.09.2016**

On the dates **05.08.2016** ETKO Inspector **(b) (6), (b) (7)(C)** realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
51610020	Barley seeds	3080F-02 Diana	Field No. ■	Chlorpyrifos	0,04	None	0.01	Noncompliance

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **26.10.2016** (in 30 days, starting from the date of this notification)

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYUZ** from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3080F-02 Diana	Nr	GP 18 F 10
		Date	15.07.2015
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Noncompliances:

Noncompliance No	15.6	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	04.08.2016
Date of Notification	26.09.2016		Due Date	26.10.2016
<p>Noncompliance :</p> <p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Issues:</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report.</p>				
Inspection criteria	NOP reg. ref	205.105 (a,e)	ETKO rules ref.	5.9
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ferenc Vasily Ivanovich		Date	
Review Date			Resolved <input type="checkbox"/>	
			Unresolved <input type="checkbox"/>	
Review Comment:				
Reviewer name & signature:				

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: (b) (6)
Subject: Notification of Resolution of Non-Compliances- Efal 2325F-01
Date: Tuesday, August 30, 2016 11:03:12 AM
Attachments: [image001.jpg](#)
[NRONC 2325F-01 EFAL.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Efal 2325F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: [ma@etko.org](#); [fa@etko.org](#); (b) (6)
Subject: Notification of Resolution of Non-Compliances- Efal 2325F-01
Date: Friday, August 05, 2016 11:22:56 AM
Attachments: [image001.jpg](#)
[2325F-01 EFAL GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Efal 2325F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.org, **Web:** www.etko.org

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	Notification of Noncompliance	Nr	GP 18 F 10
		Date	15.07.2015
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2325F-01 EFAL			

Dear Madam / Sir: **Aytekın METE**

Date: **01.08.2016**

On the dates (**19.07.2016**) ETKO Inspector Mr./ Mrs. **(b) (6), (b) (7)(C)** realized an application review / initial / **continuing** / recertification / surveillance inspection to your operation. The objective of (the review was to ensure the completeness of your application) / inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the application review findings / inspection report dated...**19.07.2016**., ETKO determined the outstanding noncompliances in your file / operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than.....**30.08.2016**..... (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by email at:

fa@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

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		Date	15.07.2015
		Rev	00
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Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance:</p> <p>205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>205.103.a.b.c The producer couldn't submit the records related to purchase and sale and, the harvest quantities during the inspection. The records upon how much and which type of products were harvested providing the dates and their buyers aren't present on their files.</p>				
Inspection criteria	NOP reg. ref	205.103.a.b.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date				Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance	Nr	GP 18 F 10
		Date	15.07.2015
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2325F-01 EFAL			

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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>205.202 Land requirements.</p> <p>Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206;</p> <p>(b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and</p> <p>(c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.</p> <p>205.202.c Some neighbourhood conventional parcels have been found in only two areas of the producer’s fields. There is no Buffer Zone indication on the maps of these two areas.</p>				
Inspection criteria	NOP reg. ref	205.202.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Resolution of Noncompliance 2325F-01 EFAL	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: **Aytekin METE**

Date: **30.08.2016**

On the date **(19.07.2016)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **continuing inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at: ma@etko.org, info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **2**

NC number(s) : **16.1, 16.2, See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

	Notification of Resolution of Noncompliance 2325F-01 EFAL	Nr	GP 18 F 11
		Date	15.07.2015
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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance:</p> <p>205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>205.103.a.b.c The producer couldn't submit the records related to purchase and sale and, the harvest quantities during the inspection. The records upon how much and which type of products were harvested providing the dates and their buyers aren't present on their files.</p>				
Inspection criteria	NOP reg. ref	205.103.a.b.c	ETKO rules ref.	
<p>Action taken</p> <p>See attachment for harvest and selling records.</p>				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Aytekin METE		Date	29.08.2016
Review Date	29.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment:</p> <p>Harvest and selling records were provided to ETKO, (see annex NC 1)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

	Notification of Resolution of Noncompliance 2325F-01 EFAL	Nr	GP 18 F 11
		Date	15.07.2015
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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	19.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
Noncompliance : 205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must: (a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management. 205.202.c Some neighborhood conventional parcels have been found in only two areas of the producer's fields. There is no Buffer Zone indication on the maps of these two areas.				
Inspection criteria	NOP reg. ref	205.202.c	ETKO rules ref.	
Action taken See attached maps				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Aytekin METE		Date	29.08.2016
Review Date	29.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Mentioned parcels maps were provided to ETKO. Buffer zones are indicated on maps. (See annex NC 2) Reviewer name & signature: Mustafa AKYÜZ				

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: [Alexey Khachkovskiy](#)

Date: **20.12.2016**

On the dates (**07.10.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **17.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **12.12.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYUZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

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

Result of Evaluation:

- Closed noncompliance: **2**

NC number(s) : **2016.1, 2016.2** [See below forms.](#)

- Outstanding noncompliance : **None**

NC number(s) :

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Outstanding Noncompliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3141-2016.fa
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	07.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-9.6	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issues: - There is no status of organic on the BL loading documents and invoices of last shipment (last transaction number is TK.14.3141-013-C)</p>					
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Khackovskiy		
Corrective Action Plan by Operator					
We are aware of the issue and we guarantee compliance of 205.103b. We will prepare trade documents and labels including status of the product and the lot number clearly from now on.					
Target date	17.11.2016	Operator name and signature	Alexey Khackovskiy	Actual Completion date	12.12.2016
Verification of Operator's corrective action and implementation by ETKO					
Accepted: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Date	19.12.2016	ETKO approval	Mustafa AKYÜZ	
<p>Explanations: We accept their Declaration and will monitor their future trade documents and labels particularly for this issue. (See Annex 1 and 2)</p>					

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/3

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3141-2016.fa
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Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	07.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input checked="" type="checkbox"/> Major M2-9.2		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input checked="" type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.</p> <p>Issues: - 205.102- The last transaction (TK.14.3141-013-C), Ekolium did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number)</p>			
Inspector Name and signature	(b), (6), (b) (7)(C)	Operator name and signature	Alexey Khackovskiy
Corrective Action Plan by Operator			
Please find attached declaration. We prepared instruction and from now labels with correct information will be used. Instruction for transportation was created. Please find it attached.			
Target date	17.11.2016	Operator name and signature	Alexey Khackovskiy
		Actual Completion date	12.12.2016
Verification of Operator's corrective action and implementation by ETKO			
Accepted:	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Date	19.12.2016
		ETKO approval	Mustafa AKYÜZ
Explanations: They formed an instruction for transporting the goods with status "organic" where all the requirements described and sent this instruction to their suppliers. (See Annex 1 and 2)			

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Dear Madam / Sir: [Alexey Khachkovskiy](#)

Date: **17.10.2016**

On the dates (**07.10.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **07.10.2016** ETKO determined the outstanding noncompliance's in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYUZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Non-compliances:

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

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	07.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
Major		Minor M1-9.6	
Factors causing risk on the product		Factors causing no risk on the condition of the product.	
Use of inputs which are not allowed by the regulations.		Production process plan partly implemented.	
Non-Organic product sales as organic.			
Requirements of regulation or standard not applied			
Frequent minor non-conformities on the same requirement of regulation.			
Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
Misuse of the licenses and certificates			
Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issues: - There is no status of organic on the BL loading documents and invoices of last shipment (last transaction number is TK.14.3141-013-C)</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Khackovski
Corrective Action Plan by Operator			
Target date	14.11.2016	Operator name and signature	Alexey Khackovski
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted:	YES	NO	Date
		ETKO approval	

	Notification of Noncompliance 3141D-01 Ekolium	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Explanations

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

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
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Subject of nonconformity	Labelling	Std or reg. Art. nr. IACB7.5.2, NOP 205.307	NCR No 2016.2
Inspection Date	07.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
Major M2-9.2		Minor	
Factors causing risk on the product		Factors causing no risk on the condition of the product.	
Use of inputs which are not allowed by the regulations.		Production process plan partly implemented.	
Non-Organic product sales as organic.			
Requirements of regulation or standard not applied			
Frequent minor non-conformities on the same requirement of regulation.			
Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
Misuse of the licenses and certificates			
Production process plan not implemented.			

Description of Nonconformity by Inspector

§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:

(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;

(2) Identification of the product as organic;

(3) Special handling instructions needed to maintain the organic integrity of the product;

(4) The USDA seal;

(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.

(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.

Issues: - 205.102- The last transaction (TK.14.3141-013-C), Ekolium did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number)

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Khackovskiy
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Corrective Action Plan by Operator			

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

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

Accepted: YES	NO	Date		ETKO approval	
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Explanations:

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: (b) (6)
Subject: Notification of Resolution of Non-Compliances_ Ekolium 3141D-01
Date: Wednesday, January 18, 2017 10:30:46 AM
Attachments: [image001.jpg](#)
[3141D-01 Ekolium - NRONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Ekolium 3141D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.com.tr , **Web:** www.etko.com.tr

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From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: (b) (6)
Subject: Notification of Non-Compliances_ Ekolium 3141D-01
Date: Monday, October 17, 2016 4:05:31 AM
Attachments: [image001.jpg](#)
[3141D-01 Ekolium - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Ekolium 3141D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.org, **Web:** www.etko.org

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	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/4

Dear Madam / Sir: **Iliin Dmitriy Ivanovich**

Date: **30.08.2016**

On the dates (**22.08.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a **follow up inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **22.08.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.09.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely

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

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/4

Non-compliances:

Operator unit no.	3216F-01	Unit name	"Helianthus" Llc
Location - Address	1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-01.2016.ac
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Subject of nonconformity	Crop rotation (M1)	Std or reg. Art. nr. COR 5.4.2, NOP 205.203b IACB 6.4.3.2	NCR No 2016.1
Inspection Date	22.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product	<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
§205.203 Soil fertility and crop nutrient management practice standard.			
(a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.			
(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials			
Issue: Crop rotation is not include leguminous crops, green manure or other crops.			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Iliin Dmitriy Ivanovich
Corrective Action Plan by Operator			
Crop rotation for the next agriculture season will be developed, including green manure into the structure of arable fields.			
Target date	30.09.2016	Operator name and signature	Iliin Dmitriy Ivanovich
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations			

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/4

Operator unit no.	3216F-01	Unit name	"Helianthus" Llc
Location - Address	1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-01.2016.ac	

Subject of nonconformity	Risk of contamination (M2)	Std or reg. Art. nr. NOP 205.103a,b,c, 205.201.5. IACB 6.3.1.ii, COR 5.1.5	NCR No 2016.2
Inspection Date	22.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input checked="" type="checkbox"/> Major		<input type="checkbox"/> Minor	
<input checked="" type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issue: Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records..</p> <p>Issue: Evidence of payment for the rent to the land owners, as they receive products from Helianthus management not provided.</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Iliin Dmitriy Ivanovich
Corrective Action Plan by Operator			
<p>We use system when we cut crop around the fields before the main harvest and then put the crops (BZcrops-обкосы) to separate storage (or open place). We use the BZcrops (обкосы) for feed of own animal farm.</p> <p>Incoming of the BZcrops will be marked in storage register book and in agronomist records. Evidence of payment for the rent to land owners will be provided</p>			
Target date	30.09.2016	Operator name and signature	Iliin Dmitriy Ivanovich
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations			

	Notification of Noncompliance 3216F-01 Helianthus.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	4/4

Operator unit no.	3216F-01	Unit name	"Helianthus" Llc
Location - Address	1-A Kirov str., Pereshchepino city, Novomoskovsk distr., Dnipropetrovsk reg., Ukraine 51220		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>		Report no 3216F-01.2016.ac

Subject of nonconformity	Risk of contamination (M2)	Std or reg. Art. nr. NOP, IACB	NCR No 2016.3
Inspection Date	22.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
Organic production. A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.			
Issue: Producers make a conservation and develop plan of the biodiversity in the farm.			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Iliin Dmitriy Ivanovich
Corrective Action Plan by Operator			
We will prepare and provide plan of the biodiversity in the farm.			
Target date	30.09.2016	Operator name and signature	Iliin Dmitriy Ivanovich
Actual Completion date			
Verification of Operator's corrective action and implementation by ETKO			
Accepted:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date
ETKO approval			
Explanations			

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/4

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

Date: **30.08.2016**

On the dates (**23.08.2016**) ETKO Inspector **(b) (6), (b) (7)(C)**) realized a **follow up inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **23.08.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.09.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely

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

Cc: NOP appeals team NOPCAAAdverseActions@ams.usda.gov

	Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/4

Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-03.2016.ac
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Subject of nonconformity	Crop rotation (M1)	Std or reg. Art. nr. COR 5.4.2, NOP 205.203b IACB 6.4.3.2	NCR No 2016.1
Inspection Date	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
§205.203 Soil fertility and crop nutrient management practice standard. (a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion. (b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials Issue: Crop rotation is not include leguminous crops, green manure or other crops.			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Zadorozhniy Vitaliy Mikhailovich
Corrective Action Plan by Operator			
Crop rotation for the next agriculture season will be developed, including green manure into the structure of arable fields.			
Target date	30.09.2016	Operator name and signature	Zadorozhniy Vitaliy Mikhailovich
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations			

Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
	Date	15.07.2015
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	Page	3/4

Operator unit no.	3216F-03	Unit name	Zhytnitsa
Location - Address	1-A, Tsentralna str., Karpivka vill., Shyrokiivskiy distr., Dnipropetrovsk reg., Ukraine 53742		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection	<input checked="" type="checkbox"/> Report no 3216F-03.2016.ac	

Subject of nonconformity	Risk of contamination (M2)	Std or reg. Art. nr. NOP 205.103a,b,c, 205.201.5. IACB 6.3.1.ii, COR 5.1.5	NCR No 2016.2
Inspection Date	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input checked="" type="checkbox"/> Major		<input type="checkbox"/> Minor	
<input checked="" type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must:</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>Issue: Harvested BZ Products traceability not in place, including indications in records of agronomist book and storage records..</p> <p>Issue: Evidence of payment for the rent to the land owners, as they receive products from Zhytnitsa management not provided.</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Zadorozhniy Vitaliy Mikhaylovich
Corrective Action Plan by Operator			
<p>We use system when we cut crop around the fields before the main harvest and then put the crops (BZcrops-обкосы) to separate storage (or open place). We use the BZcrops (обкосы) for conventional selling or for rental payment. Incoming of the BZcrops will be marked in storage register book and in agronomist records. Evidence of payment for the rent to land owners will be provided.</p>			
Target date	30.09.2016	Operator name and signature	Zadorozhniy Vitaliy Mikhaylovich
			Actual Completion date
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations			

Notification of Noncompliance 3216F-03 Zhytnitsa.Rev1	Nr	GP 18 F 10
	Date	15.07.2015
	Rev	00
	Page	4/4

Operator unit no.	3216F-03	Unit name	Zhytnitsa
Location - Address	1-A, Tsentralna str., Karpivka vill., Shyrovivskiy distr., Dnipropetrovsk reg., Ukraine 53742		
Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3216F-03.2016.ac	

Subject of nonconformity	Risk of contamination (M2)	Std or reg. Art. nr. NOP, IACB 4.2a, COR 1.2b	NCR No 2016.3
Inspection Date	23.08.2016		
Date of Notification	30.08.2016	Due Date	30.09.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input checked="" type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>Organic production. A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.</p> <p>Issue: Producers make a conservation and develop plan of the biodiversity in the farm.</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Zadorozhniy Vitaliy Mikhaylovich
Corrective Action Plan by Operator			
We will prepare and provide plan of the biodiversity in the farm.			
Target date	30.09.2016	Operator name and signature	Zadorozhniy Vitaliy Mikhaylovich
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations			

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Сс: [Юлия Логвин](#)
Subject: Notification of Non-Compliances_ Heliantus 3216F-01 and Zhytnitsa 3216F-03
Date: Tuesday, August 30, 2016 5:19:09 AM
Attachments: [image001.jpg](#)
[3216F-01 Heliantus - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)
[3216F-03 Zhytnitsa - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Heliantus 3216F-01 and Zhytnitsa 3216F-03 which are the farms of Sayvo 3216D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.org, **Web:** www.etko.org

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	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/8

Dear Sir: [Shin Dongyeop](#)

Date: **30.06.2016**

On the dates (**11.04.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized an [initial inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **11.04.2016** ETKO determined the outstanding noncompliances in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **30.07.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYÜZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org .

Sincerely

Enclosure: Inspection report number:

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

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
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Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>There is no explanation regarding how to avoid organic production from contamination. Protecting measures of contamination haven't been documented as the contamination protecting procedures in all the production activities.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5) 205.272(a)	ETKO rules ref.	205.201(a)(5) 205.272(a)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.				
<p style="color: red;">There is no explanation for inputs used as products, organic certificate, manufacturing process, product brochure etc. They use sodium hypochlorite and water for cleaning. Cleaning procedures and its records of irrigation aren't attached. Sodium hypochlorite and water is used. Sodium hypochlorite products specification isn't attached.</p>				
Inspection criteria	NOP reg. ref	205.201.(a)	ETKO rules ref.	205.201.(a)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
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Noncompliance No	16.3	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.203 Soil fertility and crop nutrient management practice standard. (a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion. (b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials. (c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include: The water analysis report and chlorine concentration aren't indicated.				
Inspection criteria	NOP reg. ref	205.203 (c)(3)	ETKO rules ref.	205.203 (c)(3)
Action taken Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Reviewer name & signature:				

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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.206 Crop pest, weed, and disease management practice standard.</p> <p>(a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to:</p> <p>(1) Crop rotation and soil and crop nutrient management practices, as provided for in §§205.203 and 205.205;</p> <p>(2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and</p> <p>(3) Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.</p> <p>(d) Disease problems may be controlled through:</p> <p>(1) Management practices which suppress the spread of disease organisms; or</p> <p>(2) Application of nonsynthetic biological, botanical, or mineral inputs.</p> <p>Pest, weed, and disease management program aren't attached.</p> <p>More details of neem oil aren't attached such as products specification, organic certificate, manufacturing process, product brochure etc.</p> <p>Disease management procedures haven't been indicated by the producer.</p>				
Inspection criteria	NOP reg. ref	205.206 (a) 205.206 (d)	ETKO rules ref.	205.206 (a) 205.206 (d)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date				Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
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		Page	6/8

Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.202 Land requirements.</p> <p>Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206;</p> <p>(b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and</p> <p>(c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.</p> <p>There is no indication regarding the condition of neighboring farm as like conventional, organic and crop type in the attached map.</p> <p>In the attached map field boundaries are defined. But there is no scale and specific address.</p> <p>The neighbors farming type, paths width and scales of map have not been pointed out by the producer.</p>				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	205.202 (c)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

	Notification of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 10
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Noncompliance No	16.6	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; Farm Production Report is not taken and not attached yet.				
Inspection criteria	NOP reg. ref	205.201 (a)(2)	ETKO rules ref.	205.201 (a)(2)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliance No	16.7	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:</p> <p>(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and</p> <p>Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.</p>				
Inspection criteria	NOP reg. ref	205.201(a)(5)	ETKO rules ref.	205.201(a)(5)
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop		Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAverseActions](#)
Subject: Notification of Resolution of Non-Compliances- Manna CEA 3219F-01
Date: Friday, July 01, 2016 10:34:24 AM
Attachments: [image001.jpg](#)
[NONC 3219F-01 Manna CEA.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliance for MannaCea. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.org, **Web:** www.etko.org

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

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: ma@etko.org; info@mannacea.com
Subject: Notification of Resolution of Non-Compliances- Manna CEA 3219F-01
Date: Wednesday, July 13, 2016 8:42:31 AM
Attachments: [image001.jpg](#)
[NRONC 3219F-01 Manna CEA.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for MannaCea. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
Email/eposta: cb@etko.org, **Web:** www.etko.org

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Dear Madam / Sir: **Shin Dongyeop**

Date: **12.07.2016**

On the date **(11.04.2016)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **an initial inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance:

NC number(s) : **16.1, 16.2, 16.3, 16.4, 16.5, 16.6, 16.7 See below forms**

- Outstanding noncompliance : **None**

NC number(s) :

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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. There is no explanation regarding how to avoid organic production from contamination. Protecting measures of contamination haven't been documented as the contamination protecting procedures in all the production activities.				
Inspection criteria	NOP reg. ref	205.201(a)(5) 205.272(a)	ETKO rules ref.	205.201(a)(5) 205.272(a)
Action taken: The major source of contamination is regarded as water and it is monitored periodically. Protecting measures of contamination are attached.				
Please identify the supporting documents, if any: Annex 1,2 and 18, 19, 24- Protecting measures of contamination				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop (b) (6)		Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: The required documents are provided and they are proper. Protecting measures of contamination are attached. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.2	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations. There is no explanation for inputs used as products, organic certificate, manufacturing process, product brochure etc. They use sodium hypochlorite and water for cleaning. Cleaning procedures and its records of irrigation aren't attached. Sodium hypochlorite and water is used. Sodium hypochlorite products specification isn't attached.				
Inspection criteria	NOP reg. ref	205.201.(a)	ETKO rules ref.	205.201.(a)
Action taken: Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided. Please identify the supporting documents, if any: Annex 14, 15 and 31 of Input materials, Annex 18- Cleaning procedures and its records, Annex 19- Sodium hypochlorite specifications				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Input materials are provided. Cleaning procedures and its records are provided. Sodium hypochlorite products specifications are provided. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.3	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.203 Soil fertility and crop nutrient management practice standard. (a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion. (b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials. (c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include: The water analysis report and chlorine concentration aren't indicated.				
Inspection criteria	NOP reg. ref	205.203 (c)(3)	ETKO rules ref.	205.203 (c)(3)
Action taken: Water report is provided.				
Please identify the supporting documents, if any: Annex 1 and 2 - Water Analyses				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Water report is provided.				
Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.206 Crop pest, weed, and disease management practice standard. (a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to: (1) Crop rotation and soil and crop nutrient management practices, as provided for in §§205.203 and 205.205; (2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and (3) Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases. (d) Disease problems may be controlled through: (1) Management practices which suppress the spread of disease organisms; or (2) Application of nonsynthetic biological, botanical, or mineral inputs. Pest, weed, and disease management program aren't attached. More details of neem oil aren't attached such as products specification, organic certificate, manufacturing process, product brochure etc. Disease management procedures haven't been indicated by the producer.				
Inspection criteria	NOP reg. ref	205.206 (a) 205.206 (d)	ETKO rules ref.	205.206 (a) 205.206 (d)
Action taken: Pest, weed, and disease management program are provided. About neem oil OMRI Certificate and analysis report are provided. Disease management procedures are attached.				
Please identify the supporting documents, if any: Annex 4-Neem oil Analyses Report, OMRI Certificate and Annex 4 & 5- Pest, weed, and disease management procedures				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Pest, weed, and disease management program are provided. About neem oil OMRI Certificate and analysis report are provided. Disease management procedures are attached.				
Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must: (a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management. There is no indication regarding the condition of neighboring farm as like conventional, organic and crop type in the attached map. In the attached map field boundaries are defined. But there is no scale and specific address. The neighbors farming type, paths width and scales of map have not been pointed out by the producer.				
Inspection criteria	NOP reg. ref	205.202 (c)	ETKO rules ref.	205.202 (c)
Action taken: Detailed map of showing the circumstances are attached.				
Please identify the supporting documents, if any: Annex 6- Maps				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Detailed map of showing the circumstances are attached.				
Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	16.6	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; Farm Production Report is not taken and not attached yet.				
Inspection criteria	NOP reg. ref	205.201 (a)(2)	ETKO rules ref.	205.201 (a)(2)
Action taken : 'Farm production report` attached.				
Please identify the supporting documents, if any: Annex 7- Farm production report				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: 'Farm production report` is attached.				
Reviewer name & signature: Fatih Aksoy				

	Notification of Resolution of Noncompliance 3219F-01 Manna CEA	Nr	GP 18 F 11
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Noncompliance No	16.7	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.04.2016
Date of Notification	30.06.2016		Due Date	30.07.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and Farm field is isolated from natural ecosystem and so many species are taken from others. There is no explanation regarding this matter.				
Inspection criteria	NOP reg. ref	205.201(a)(5)	ETKO rules ref.	205.201(a)(5)
Action taken : It is managed in a closed system but maintained biodiversity by planting a variety of species.				
Please identify the supporting documents, if any: Annex 28- Declaration				
Name, Surname and Signature of Appl. Resp.	Shin Dongyeop	(b) (6)	Date	04.07.2016
Review Date	11.07.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: The Declaration regarding this issue is provided. Reviewer name & signature: Fatih Aksoy				

	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
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Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **02.01.2016**

On the dates (**04.08.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result	Date
20360	Soybean Plants	3080F-01 Rinagro	Field No [REDACTED]	Pyraclostrobin	0,139	None	0,01	Noncompliance	26.08.2016
OZ140004	Soybean Plants	3080F-01 Rinagro	Field No [REDACTED]	Pyraclostrobin	0,064	None	0,01	Noncompliance	14.10.2016

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **14.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **14.11.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYUZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **1**
NC number(s) : **2016.1** **See below forms.**
- Outstanding noncompliance : **None**

NC number(s) :

	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

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

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

Subject of nonconformity	Analyses	Std or reg. Art. nr.	NCR No 2016.1
Inspection Date	04.08.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
<input checked="" type="checkbox"/> Major S2. 7.4		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input checked="" type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report. Sample of soya plants was taken in the middle of the field № [redacted]. Distance from source of contamination was approximately 150 meters. source of contamination was found – a small conventional garden next to the field № [redacted].</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Igor Okunenko
Corrective Action Plan by Operator			
<p>There is no direct use of any chemical substances however, Pyraclostrobin is a fungicide used for fruits and the neighbor as the owner of the conventional fruit garden next to the field no [redacted] confirmed that they've used this substance for their fruit trees treatment. So, the source of contamination is the neighbor's conventional fruit garden. Thus, RinAgro and Sadeko agreed on the following monitoring plan for neighboring areas for the next years:</p> <ul style="list-style-type: none"> - March 2017 - soil from the field no [redacted] sampling and analysis, - May-June 2017 - sampling and analysis of young crops/plants from field no [redacted] in the period of vegetation (depending on the crop that will be sown), - July-September 2017 - sampling and analysis of available product from field [redacted] (depending on the crop that will be sown) 			

	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	3/3

Target date	14.11.2016	Operator name and signature	Igor Okunenko	Actual Completion date	20.12.2016
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	20.12.2016	ETKO approval Mustafa Akyüz
Explanations: According to our inspector, [REDACTED] explanation, sample of soya plants was taken in the middle of the field Nr [REDACTED]. Distance from source of contamination was approximately 150 meters. Source of contamination was found – a small conventional garden next to the field Nr [REDACTED]. We decided to transfer the whole field nr. [REDACTED] in IC period for two years for check-monitoring to avoid all risks. The product is disqualified from organic production so, the operator sold them as conventional in this year.					

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: ma@etko.com.tr; trade@sadeko.org; [Office Sadeko](#)
Subject: Notification of Resolution of Non-Compliances- RinAgro 3080F-01
Date: Wednesday, February 08, 2017 7:35:59 AM
Attachments: [image001.jpg](#)
[3080F-01 RinAgro- Notification of Resolution of Noncompliance.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

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	Notification of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **14.10.2016**

On the dates **04.08.2016** ETKO Inspector **(b) (6), (b) (7)(C)** realized a **surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation:

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result
OZ140004	Soybean Plants	3080F-01 Rinagro	Field No. ■	Pyraclostrobin	0,064	None	0,01	Noncompliance

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

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

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYUZ** from ETKO

ETKO
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY
T+90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

Non-compliances:

	Notification of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

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

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

Subject of nonconformity	Analyses	Std or reg. Art. nr.	NCR No 2016.1
Inspection Date	04.08.2016	NOP 205.105	
Date of Notification	14.10.2016	Due Date	14.11.2016
<input checked="" type="checkbox"/> Major S2. 7.4		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input checked="" type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector					
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603; (b) Nonsynthetic substances prohibited in §205.602 or §205.604; (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605; (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606; (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a); (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and (g) Sewage sludge.</p> <p>Issues: Detection of chemical substances in organic products. See above listed laboratory results and analyses report. Sample of soya plants was taken in the middle of the field Nr [REDACTED] Distance from source of contamination was approximately 150 meters. source of contamination was found – a small conventional garden next to the field Nr [REDACTED]</p>					
Inspector Name and signature	[REDACTED]	Operator name and signature	Igor Okunenko		
Corrective Action Plan by Operator					
Target date	14.11.2016	Operator name and signature	Igor Okunenko	Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES	NO	Date	ETKO approval	
Explanations					

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: trade@sadeko.org
Subject: Notification of Non-Compliances_ RinAgro 3080F-01
Date: Tuesday, December 13, 2016 10:43:50 AM
Attachments: [image001.jpg](#)
[3080F-01 RinAgro- Notification of Noncompliance.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

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	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: **Okunenko Igor Nicolaevich**

Date: **02.01.2017**

On the dates (**04.08.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized **a surveillance inspection** to your operation. The objective of inspection was to determine your organic operation's compliance against the regulation (s):

USDA National Organic Program

The samples taken during the inspection were analyzed and following results were found. The product listed below does not comply NOP Regulation.

Report no	Product Name	Operator	Store-Land	Substances	Residue (mg/kg)	EPA Tolerance	5% of EPA Tolerance	Result	Date
20360	Soybean Plants	3080F-01 Rinagro	Field No [REDACTED]	Pyraclostrobin	0,139	None	0,01	Noncompliance	26.08.2016
OZ140004	Soybean Plants	3080F-01 Rinagro	Field No [REDACTED]	Pyraclostrobin	0,064	None	0,01	Noncompliance	14.10.2016

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **14.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **14.11.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYUZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

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

Result of Evaluation:

- Closed noncompliance: **1**
NC number(s) : **2016.1** **See below forms.**
- Outstanding noncompliance : **None**

NC number(s) :

	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

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

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

Subject of nonconformity	Analyses	Std or reg. Art. nr.	NCR No 2016.1
Inspection Date	04.08.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
<input checked="" type="checkbox"/> Major S2. 7.4		<input type="checkbox"/> Minor	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input checked="" type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>Detection of chemical substances in organic products. See above listed laboratory results and analyses report. Sample of soya plants was taken in the middle of the field N⁰⁰⁴. Distance from source of contamination was approximately 150 meters. source of contamination was found – a small conventional garden next to the field N⁰⁰⁴.</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Igor Okunenko
Corrective Action Plan by Operator			
<p>There is no direct use of any chemical substances however, Pyraclostrobin is a fungicide used for fruits and the neighbor as the owner of the conventional fruit garden next to the field no. ⁰⁰⁴ confirmed that they've used this substance for their fruit trees treatment. So, the source of contamination is the neighbor's conventional fruit garden. Thus, RinAgro and Sadeko agreed on the following monitoring plan for neighboring areas for the next years:</p> <ul style="list-style-type: none"> - March 2017 - soil from the field no. ⁰⁰⁴ sampling and analysis, - May-June 2017 - sampling and analysis of young crops/plants from field no. ⁰⁰⁴ in the period of vegetation (depending on the crop that will be sown), - July-September 2017 - sampling and analysis of available product from field # ⁰⁰⁴ (depending on the crop that will be sown) 			

	Notification of Resolution of Noncompliance 3080F-01 RinAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	3/3

Target date	14.11.2016	Operator name and signature	Igor Okunenko	Actual Completion date	20.12.2016
Verification of Operator's corrective action and implementation by ETKO					
Accepted:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	02.01.2017	ETKO approval Mustafa Akyüz
Explanations: According to our inspector, [REDACTED] explanation, sample of soya plants was taken in the middle of the field N [REDACTED]. Distance from source of contamination was approximately 150 meters. Source of contamination was found – a small conventional garden next to the field N [REDACTED]. We decided to transfer the whole field nr. [REDACTED] in IC period for two years for check-monitoring to avoid all risks. The product is disqualified from organic production so, the operator sold them as conventional in this year.					

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAverseActions](#)
Cc: [ma@etko.com.tr](#); [trade@sadeko.org](#); [Office Sadeko](#)
Subject: RE: Notification of Resolution of Non-Compliances- RinAgro 3080F-01
Date: Wednesday, February 08, 2017 7:51:32 AM
Attachments: [image001.jpg](#)
[3080F-01 RinAgro- Notification of Resolution of Noncompliance.pdf](#)

Dear Sirs,

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

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

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From: Ceren BAYAZIT [mailto:cb@etko.com.tr]
Sent: Wednesday, February 8, 2017 3:36 PM
To: 'AMS - NOPACAAverseActions' (NOPACAAverseActions@ams.usda.gov)
Cc: [ma@etko.com.tr](#); [trade@sadeko.org](#); [Office Sadeko](#) (office@sadeko.org)
Subject: Notification of Resolution of Non-Compliances- RinAgro 3080F-01

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for RinAgro 3080F-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

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From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions; [Юлия Логвин](#)
Cc: ma@etko.org; fa@etko.org
Subject: Notification of Resolution of Non-Compliances- Sayvo 3216
Date: Monday, June 27, 2016 10:09:56 AM
Attachments: [image001.jpg](#)
[NRONC 3216F-01 Helliantus.pdf](#)
[NRONC 3216F-02 Dovira.pdf](#)
[NRONC 3216F-03 Zhytnitsa.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Sayvo 3216. For any remaining questions do not hesitate to contact to me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

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	Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	1/5

Dear Madam / Sir: [Ilin Ivan Alekseevich](#)

Date: **23.06.2016**

On the date **(11.12.2015)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **an initial inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **3**

NC number(s) : **15.1, 15.2, 15.3 See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

	Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	2/5

Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 There is risks of contamination. There is a lot of dust in storage N1 were store corn (300t). Also there is red color stain. Director says that stain made 3 years ago and will be cleaned. They have no records about storage cleaning.				
Inspection criteria	NOP reg. ref	205.272a	ETKO rules ref.	834-Article 12.1 IACB 6.5.3, 11.1
Action taken : Storages were swept, stains were cleaned. Storage cleansing register was unimplemented.				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	11.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Storage cleaning register is presented. (last cleaning is done 25.04.2016 by (b) (4) .) Reviewer name & signature: Fatih Aksoy				

	Notification of Resolution of Noncompliance 3216F-01 Helliantus LLC	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	3/5

Noncompliance No	2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
Inspection criteria	NOP reg. ref	205.203 (c), 205.205	ETKO rules ref.	834-Art.4, 5, IACB 4.1, 4.2, 6.4.3 5.1 OCP, 1.3 OCP
<p>Action taken : All sections of the Annex were finished.</p> <p>Please identify the supporting documents, if any: OCP Annex Farm Production Report</p>				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	07.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Confirmed. See Annex.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	3	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.</p> <p>14.1 OCP They have map of farm fields but buffer zones are not described well. 14.2 OCP Buffer zones are not indicated on the fields map 14.3 OCP Director knows neighbors of the farm, but description was not made on the map.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	834-Article 12.1, IACB 6.5.3, 14.1-14.3 OCP
Action taken : The field map was redrawn with the indication of the neighbors and buffer zones.				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Neighbors of farm are indicated on the map. Risky buffer zones are indicated on the map by red color. See annex- map.				
Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: Except, That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;</p> <p>16.2- 16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided. 16.4 OCP Vendor Declaration is not present. 16.5 OCP Annex Farm Production Report, "Propagation Material" invoices and certificates for all used seeds not provided.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	834-Article 12.1, IACB 6.5.3, 14.1-14.3 OCP
Action taken : Propagation Material Approval form was filled in, the letter about absence of organic seeds is submitted. OCP Vendor Declaration and some of the certificates are not present, because in spring 2015 the farm was not under organic regulations and didn't get everything.				
Please identify the supporting documents, if any: Prop. Material Approval Form, Letter about seeds				
Name, Surname and Signature of Appl. Resp.	Ilin Ivan Alekseevich		Date	07.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Letters, forms and certificates, invoices are presented. See annexes. Corn was sold as conventional.				
Reviewer name & signature: Fatih Aksoy				

	Notification of Resolution of Noncompliance 3216F-02 Dovira	Nr	GP 18 F 11
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Dear Madam / Sir: **Struk Victor Ivanovych**

Date: **23.06.2016**

On the date **(11.12.2015)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **an initial inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **5**

NC number(s) : **15.1, 15.2, 15.3, 15.4, 15.5 See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

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Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 11.1 (OCP) There is the risks of contamination, -Sowing machines has traces of red color, which was explained that they used to treat seeds in the past. No treatment was done for 2015 crops because producer decided to start with organic production. See picture.				
Inspection criteria	NOP reg. ref	205.272	ETKO rules ref.	834-Article 12.1 IACB 6.5.3, 11.1 OCP, 11.3 OCP, 11.4 OCP
Action taken : Bunkers of sowing machines were washed.				
Please identify the supporting documents, if any: 3216F-02 Dovira - Register of cleaning				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	05.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Register of machines cleaning is presented. Sowing machines were cleaning by water. 03.03.2016 , 08.04.2016 Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	2	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must: (1) Be adapted to the particular business that the certified operation is conducting; (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
Inspection criteria	NOP reg. ref	§205.103	ETKO rules ref.	IACB 10.2
Action taken : OCP Annex Section "Summary All Farms" was filled in and completed. Please identify the supporting documents, if any: 3216F-02 2015 June OP 01 F 28 Farm Production Report Client.20150525				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	06.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Confirmed. Form is filled. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	3	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.</p> <p>14.1 OCP They have map of farm fields but buffer zones are not described well. 14.2 OCP Buffer zones are not indicated on the fields map 14.3 OCP Director knows neighbors of the farm, but description was not made on the map.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	IACB 6.5.3
Action taken : The field map was redrawn with the indication of the neighbors and buffer zones.				
Please identify the supporting documents, if any: 3216F-02 Dovira - Map with BZ indication				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	07.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: The map with indication of neighbors and buffer zones is presented. See annex.				
Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	11.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: Except, That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;</p> <p>16.2 -16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided. 16.4 OCP Vendor Declaration is not present 16.5 OCP Annex Farm Production Report, "Propagation Material" Invoices and certificates for all used seeds not provided</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	IACB 6.4.1, 6.4.2
<p>Action taken : Propagation Material Approval forms were filled in, the letter about absence of organic seeds was submitted. Vendor declaration for corn is failed to be taken because the farm isn't working with its supplier anymore.</p> <p>Please identify the supporting documents, if any: 3216F-02 Dovira - Propagation materials certificates and invoices, 3216F-02 Dovira - TI 45 F 01 Propagation Material Approval Form</p>				
Name, Surname and Signature of Appl. Resp.	Struk Victor Ivanovych		Date	05.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
<p>Review Comment: Seeds certificates, invoices and, propagation material approval form were presented. Risky GMO product as corn was sold as conventional.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Dear Madam / Sir: [Zadorozhniy Vitaliy Mikhailovich](#)

Date: **23.06.2016**

On the date **(10.12.2015)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **an initial inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **6**

NC number(s) : **15.1, 15.2, 15.3, 15.4, 15.5, 15.6 See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

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Resolved Noncompliances:

Noncompliance No	1	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.</p> <p>11.1 OCP There is the risks of contamination.</p> <p>- There is a lot of dust in all storages. On the floor are stains from machine oil and some red color traces. See pictures.</p> <p>- The walls and gates (made from metal mesh) have holes and birds and other pests can income to warehouses. See pictures.</p> <p>- In the old sowing machine are red color traces.</p>				
Inspection criteria	NOP reg. ref	205.272	ETKO rules ref.	IACB 6.5.3, 11.1
Action taken : The floors are cleaned from stains. The holes are patched. The sowing machines are washed. Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Register book of storages cleaning 1,2, 3216F-03 Zhytnitsa - Storages 1-7				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	05.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: The storages are cleaned and operations about cleaning have registered in register book. No dust, stains or other traces are in places. See pictures. The walls and gates (made from metal mesh) have repaired. The sowing machines are cleaned. No traces are in places. See pictures. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	2	Major <input checked="" type="checkbox"/> Minör <input type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:</p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.</p> <p>(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.</p> <p>(c) Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.</p> <p>There are no labels on the storages and stored crops are not marked.</p>				
Inspection criteria	NOP reg. ref	§205.307(a)	ETKO rules ref.	IACB 7.5.4
<p>Action taken : Storage and crops marking labels are implemented. Procedure of crops marking is made.</p> <p>Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction for storage personnel, 3216F-03 Zhytnitsa - Storages 1-7</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Labels are prepared and approved by ETKO. Storages are marked by labels. See pictures and annexes.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	3	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must: (1) Be adapted to the particular business that the certified operation is conducting; (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>1.3 OCP Annex Farm Production Report, "Farm Plot Inventory, propagation material and Pest Management" were not completed for all sections.</p>				
Inspection criteria	NOP reg. ref	§205.103	ETKO rules ref.	IACB 10.2
Action taken : OCP Annex Farm Production Report was completed. Please identify the supporting documents, if any: 3216F-03 2015 June OP 01 F 28 Farm Production Report Client.20150525				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Annex Farm Production Report is presented and all sections are filled. See annexes. Reviewer name & signature: Fatih Aksoy				

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Noncompliance No	4	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.</p> <p>11.3-11.4 OCP They have no instructions and procedures to keep integrity of organic products against any contamination risks.</p>				
Inspection criteria	NOP reg. ref	§205.272	ETKO rules ref.	IACB 6.5.3, 11.3 OCP, 11.4 OCP
<p>Action taken : “The Instruction for warehouse’s personnel” and “The Instruction for providing organic integrity” are developed. The principles of organic integrity are defined there.</p> <p>Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Instruction of organic farming, 3216F-03 Zhytnitsa - Instruction for storage personnel</p>				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	04.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: - instructions about organic growing, storing are in place - trainings of responsible were done, - storages are marked and clean (cleanings are registered)See annex.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	5	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.202 Land requirements. Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:</p> <p>(a) Have been managed in accordance with the provisions of §§205.203 through 205.206; (b) Have had no prohibited substances, as listed in §205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and (c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.</p> <p>14.1 OCP They have map of farm fields but buffer zones are not described well. 14.2 OCP Buffer zones are not indicated on the fields map 14.3 OCP Director knows neighbors of the farm, but description was not made on the map.</p>				
Inspection criteria	NOP reg. ref	§205.202	ETKO rules ref.	IACB 6.5.3, 14.1-14.3 OCP
Action taken : The map of farm fields with the description of neighbors and buffer zones is present.				
Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Map with indicated BZ				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	14.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
<p>Review Comment: Neighbors of farm are indicated on the map. Risky BZs are marced on the map by red color. They care about buffer zones. They carried out training for workers about growing organic goods. See annexe – map of farm.</p> <p>Reviewer name & signature: Fatih Aksoy</p>				

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Noncompliance No	6	Major <input type="checkbox"/> Minör <input checked="" type="checkbox"/>	Inspection Date	10.12.2015
Date of Notification	23.06.2016		Due Date	02.05.2016
<p>§205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: Except, That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;</p> <p>16.2 -16.3 OCP Propagation Material Approval forms and proves about the absence of organic seeds in local market not provided. 16.4 OCP Vendor Declaration is not present 16.5 OCP Annex Farm Production Report, "Propagation Material" Invoices and certificates for all used seeds not provided</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	IACB 6.4.1, 6.4.2
Action taken : Propagation Material Approval forms were filled in, the letter about absence of organic seeds is present. There were no cultures of GMO risk in 2015, so Vendor declaration is not present. Some certificates are not present, because 2015 harvest wasn't the organic harvest, it was sold as conventional.				
Please identify the supporting documents, if any: 3216F-03 Zhytnitsa - Propagation material approval form, 3216F-03 Zhytnitsa - Propagation material certificates 2015, 3216F-03 Zhytnitsa - Propagation material invoices 2015				
Name, Surname and Signature of Appl. Resp.	Zadorozhniy Vitaliy Mikhailovich		Date	14.04.2016
Review Date	30.04.2016		Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>	
Review Comment: Seeds Approval forms are provided also presented all documents related to seeds: invoices, acts of acceptance, certificates. Last season they didn't produce corn, soya or rapeseed (hi-risk GMO products)- VD is not needed.				
Reviewer name & signature: Fatih Aksoy				

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Dear Madam / Sir: **Umit CAKMAK**

Date: **27.07.2016**

On the dates (**21.07.2016**) ETKO Inspector Mr./ Mrs. **(b) (6), (b) (7)(C)** realized an application review / initial / **continuing** / recertification / surveillance inspection to your operation. The objective of (the review was to ensure the completeness of your application) / inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the application review findings / inspection report dated...**21.07.2016**., ETKO determined the outstanding noncompliances in your file / operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than.....**25.08.2016**..... (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to Mr. Fatih AKSOY from ETKO +90-232-3397606 or by email at:

fa@etko.org, info@etko.org

Sincerely

Enclosure: Inspection report number:

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

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Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.201 Organic production and handling system plan.</p> <p>(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;</p> <p>(3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;</p> <p>(4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;</p> <p>(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and</p> <p>(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.</p> <p>(b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: <i>Provided</i>, That, the submitted plan meets all the requirements of this subpart.</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>205.201.a.5 , 205.103.b.2 The storage spaces of organic raw material aren't indicated on the OCP report. During the inspection, it was stated that the storing activity can be carried out in 3 different warehouses and these are located in Menemen and Turgutlu storages of the operator. And there are neither the facility site plans nor a document of ownership or rental agreement for the warehouses in their record.</p>				
Inspection criteria	NOP reg. ref	205.201.a.5, 205.103.b.2	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.				Date
Review Date				Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>(b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.</p> <p>205.272.a After receiving the organic products, the products are labelled and stored as organic but, there was no labelling on the caper barrels which are stated as conventional product even though the labels were prepared.</p>				
Inspection criteria	NOP reg. ref	205.272.a	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date				Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

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Noncompliances:

Noncompliance No	16.3	Major <input type="checkbox"/>	Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016			Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>(b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part:</p> <p>(1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant;</p> <p>(2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.</p> <p>205.272.b.2, 205.103.b.2 The caper barrels in which the raw material is contained are used over and over. They indicated that these barrels are cleaned with water before dispatching to the producer by Susitaş but there is no record to evidence that.</p>					
Inspection criteria	NOP reg. ref	205.272.b.2	205.103.b.2	ETKO rules ref.	
Action taken					
Please identify the supporting documents, if any:					
Name, Surname and Signature of Appl. Resp.				Date	
Review Date				Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:					
Reviewer name & signature:					

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Noncompliances:

Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>205.103.b.2, 205.103.c – During the inspection, only the accounting records of organic capers were found, conventional caper records and the stock-sales charts were not prepared for the inspection.</p> <p>- The stock records for the auxiliary product (citric acid) used in the organic production weren't seen and so, the mass balance calculation/ stock record account for the remaining citric acid input couldn't be made (for the citric acid input used in the organic production 3+ ¾ sack of (b) (4) branded citric acid whereas in the conventional production 1 sack of (b) (4) branded citric acid used were seen but, they couldn't be found on the inventory card.)</p>				
Inspection criteria	NOP reg. ref	205.103.b.2, 205.103.c	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and Signature of Appl. Resp.			Date	
Review Date			Resolved <input type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment:				
Reviewer name & signature:				

<h2 style="margin: 0;">Notification of Noncompliance</h2> <p style="margin: 0;">2158D-01 SUSITAS</p>	Nr	GP 18 F 10
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Noncompliances:

Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>§205.271 Facility pest management practice standard.</p> <p>(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:</p> <p>(1) Removal of pest habitat, food sources, and breeding areas;</p> <p>(2) Prevention of access to handling facilities; and</p> <p>(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.</p> <p>(b) Pests may be controlled through:</p> <p>(1) Mechanical or physical controls including but not limited to traps, light, or sound; or</p> <p>(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.</p> <p>(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.</p> <p>(d) If the practices provided for in paragraphs (a), (b), and (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: <i>Provided</i>, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>(e) The handler of an organic handling operation who applies a nonsynthetic or synthetic substance to prevent or control pests must update the operation's organic handling plan to reflect the use of such substances and methods of application. The updated organic plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>(f) Notwithstanding the practices provided for in paragraphs (a), (b), (c), and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations: <i>Provided</i>, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>205.105.a.b, 205.271.e - Although they indicated that they didn't apply indoor spraying, it was seen that Susitaş were notified on their performance report dated 16.03.2016 as “the use of a prohibited substance not defined on the NOP National List, cypermethrin (prohibited chemical material) had been detected in all the areas” by the pest control company they cooperate with, (b) (4).” The company officials pointed out that it could be written by mistake that there was spraying in all the areas including the production area. This was not updated on OCP.</p>				
Inspection criteria	NOP reg. ref	205.105.a.b, 205.271.e	ETKO rules ref.	
Action taken				
Please identify the supporting documents, if any:				
Name, Surname and			Date	

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Signature of Appl. Resp.		
Review Date		Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/>
Review Comment: Reviewer name & signature:		

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAverseActions
Cc: ma@etko.org; fa@etko.org
Subject: Notification of Resolution of Non-Compliances- Susitas 2158D-01
Date: Thursday, August 04, 2016 10:01:02 AM
Attachments: [image001.jpg](#)
[2158D-01 SUSITAS GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Susitas 2158D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: info@susitas.com
Subject: Notification of Resolution of Non-Compliances- Susitas 2158D-01
Date: Tuesday, August 30, 2016 11:55:57 AM
Attachments: [image001.jpg](#)
[NRONC 2158D-01 SUSITAS.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for Susitas 2158D-01.
If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.
160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY
Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07
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Dear Madam / Sir: **Umit CAKMAK**

Date: **30.08.2016**

On the date **(21.07.2016)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **continuing inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org, info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **5**

NC number(s) : **16.1, 16.2, 16.3, 16.4, 16.5 See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

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Resolved Noncompliances:

Noncompliance No	16.1	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
Noncompliance : §205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations. (b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: <i>Provided</i> , That, the submitted plan meets all the requirements of this subpart. §205.103 Recordkeeping by certified operations. (a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))." (b) Such records must: (1) Be adapted to the particular business that the certified operation is conducting; (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited; 205.201.a.5 , 205.103.b.2 The storage spaces of organic raw material aren't indicated on the OCP report. During the inspection, it was stated that the storing activity can be carried out in 3 different warehouses and these are located in Menemen and Turgutlu storages of the operator. And there are neither the facility site plans nor a document of ownership or rental agreement for the warehouses in their record.				
Inspection criteria	NOP reg. ref	205.201.a.5, 205.103.b.2	ETKO rules ref.	
Action taken There was no warehouse in Menemen. Yet, in Turgutlu there was but it was closed down last week and all organic raw materials were transported to Çiğli facility. All organic raw materials are kept in Çiğli now. Please identify the supporting documents, if any: The photos of raw materials at Çiğli facility at the attachment.				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: All organic raw materials have been transferred to Çiğli facility and the related evidences are provided. (See annex resolution NC 1) Reviewer name & signature: Mustafa AKYÜZ				

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Noncompliance No	16.2	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 205.272.a After receiving the organic products, the products are labelled and stored as organic but, there was no labelling on the caper barrels which are stated as conventional product even though the labels were prepared.				
Inspection criteria	NOP reg. ref	205.272.a	ETKO rules ref.	
Action taken Labels of conventional caper barrels have been started to be used on the barrels again. Please identify the supporting documents, if any: The photos of conventional caper barrels .				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: The pictures of the labels of conventional caper barrels have been sent to ETKO, all barrels were labelled as shown in the pictures. (See annex resolution NC 2)				
Reviewer name & signature: Mustafa AKYÜZ				

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Noncompliance No	16.3	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
Noncompliance : §205.272 Commingling and contact with prohibited substance prevention practice standard. (a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (b) The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart D of this part: (1) Packaging materials, and storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant; (2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used. 205.272.b.2, 205.103.b.2 The caper barrels in which the raw material is contained are used over and over. They indicated that these barrels are cleaned with water before dispatching to the producer by Susitaş but there is no record to evidence that.				
Inspection criteria	NOP reg. ref	205.272.b.2 205.103.b.2	ETKO rules ref.	
Action taken Records are attached.				
Please identify the supporting documents, if any: PR_631_FR_20_BİDON TEMİZLİK VE SAĞLAMLIK KONTROL FORMU				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Evidence of cleaning records was provided. (See annex resolution NC 3)				
Reviewer name & signature: Mustafa AKYÜZ				

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Noncompliance No	16.4	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.103 Recordkeeping by certified operations.</p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p>205.103.b.2, 205.103.c – During the inspection, only the accounting records of organic capers were found, conventional caper records and the stock-sales charts were not prepared for the inspection.</p> <p>- The stock records for the auxiliary product (citric acid) used in the organic production weren't seen and so, the mass balance calculation/ stock record account for the remaining citric acid input couldn't be made (for the citric acid input used in the organic production 3+ ¾ sack of (b) (4) branded citric acid whereas in the conventional production 1 sack of (b) (4) branded citric acid used were seen but, they couldn't be found on the inventory card.)</p>				
Inspection criteria	NOP reg. ref	205.103.b.2, 205.103.c	ETKO rules ref.	
<p>Action taken</p> <p>See the attached list for organic conventional caper inventory records and the stock records for using inputs and input invoices.</p> <p>Please identify the supporting documents, if any:</p>				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016
Review Date	30.08.2016	Resolved <input checked="" type="checkbox"/> Unresolved <input type="checkbox"/>		
<p>Review Comment:</p> <p>Organic conventional caper inventory records were provided.</p> <p>The stock records for using inputs and input invoices were provided.</p> <p>(See annex resolution NC 4)</p> <p>Reviewer name & signature: Mustafa AKYÜZ</p>				

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Noncompliance No	16.5	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	Inspection Date	21.07.2016
Date of Notification	01.08.2016		Due Date	30.08.2016
<p>Noncompliance :</p> <p>§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling. To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of:</p> <p>(a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;</p> <p>(b) Nonsynthetic substances prohibited in §205.602 or §205.604;</p> <p>(c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;</p> <p>(d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;</p> <p>(e) Excluded methods, except for vaccines: <i>Provided</i>, That, the vaccines are approved in accordance with §205.600(a);</p> <p>(f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and</p> <p>(g) Sewage sludge.</p> <p>§205.271 Facility pest management practice standard.</p> <p>(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:</p> <p>(1) Removal of pest habitat, food sources, and breeding areas;</p> <p>(2) Prevention of access to handling facilities; and</p> <p>(3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.</p> <p>(b) Pests may be controlled through:</p> <p>(1) Mechanical or physical controls including but not limited to traps, light, or sound; or</p> <p>(2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.</p> <p>(c) If the practices provided for in paragraphs (a) and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.</p> <p>(d) If the practices provided for in paragraphs (a), (b), and (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: <i>Provided</i>, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>(e) The handler of an organic handling operation who applies a nonsynthetic or synthetic substance to prevent or control pests must update the operation's organic handling plan to reflect the use of such substances and methods of application. The updated organic plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>(f) Notwithstanding the practices provided for in paragraphs (a), (b), (c), and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations: <i>Provided</i>, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.</p> <p>205.105.a.b, 205.271.e - Although they indicated that they didn't apply indoor spraying, it was seen that Susitaş were notified on their performance report dated 16.03.2016 as “the use of a prohibited substance not defined on the NOP National List, cypermethrin (prohibited chemical material) had been detected in all the areas” by the pest control company they cooperate with, (b) (4) The company officials pointed out that it could be written by mistake that there was spraying in all the areas including the production area. This was not updated on OCP.</p>				
Inspection criteria	NOP reg. ref	205.105.a.b, 205.271.e	ETKO rules ref.	
<p>Action taken</p> <p>The pest control company officials accept that they made a mistake when writing on the report .Actually they made application for outdoor areas and the offices. The pest control officer came to the facility and corrected the report signing it.</p> <p>Please identify the supporting documents, if any: The fixed pest control report</p>				
Name, Surname and Signature of Appl. Resp.	Umit CAKMAK		Date	29.08.2016

	Notification of Resolution of Noncompliance 2158D-01 SUSITAS	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	7/7

Review Date	30.08.2016	Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: The company that is responsible for pest rodent control corrected their report as there was no any spraying in indoor areas, and the company declared that the report in question was prepared inexactly. (See annex resolution NC 5) Reviewer name & signature: Mustafa AKYÜZ			

	Notification of Noncompliance 3220F-01 AgroDIS	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: [Suslova Lina Ivanivna](#) Date: **17.11.2016**

On the dates (**09.09.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **09.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYÜZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-01 AgroDIS		Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-01	Unit name	AgroDIS
Location - Adres	v.Kohovka, Ananievskiy district, Odessa region Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	09.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.
(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:
(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

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

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Suslova Lina Ivanivna
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Corrective Action Plan by Operator

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

Target date	17.12.2016	Operator name and signature	Suslova Lina Ivanivna	Actual Completion date	
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Verification of Operator's corrective action and implementation by ETKO

Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-02 SVITANOK Stari Mayaky	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Oliyarchuk Ivan Ivanovich**

Date: **17.11.2016**

On the dates (**10.09.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a **surveillance inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **10.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-02 SVITANOK Stari Mayaky		Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-02	Unit name	SVITANOK Stari Mayaki
Location - Adres	v.Stari Mayaki, Shiryayevskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-02.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	10.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

Issues: - Organic fertilizers and plant protectors were applied without ETKO approval.

- Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO.

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Oliyarchuk Ivan Ivanovich
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Corrective Action Plan by Operator

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

Target date	17.12.2016	Operator name and signature	Oliyarchuk Ivan Ivanovich	Actual Completion date	
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Verification of Operator's corrective action and implementation by ETKO

Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAverseActions](#)
Cc: [makzimka@mail.ru](#)
Subject: Notification of Non-Compliances_ Ukrfield 3220
Date: Thursday, November 17, 2016 2:19:44 AM
Attachments: [image001.jpg](#)
[3220F-01 AgroDIS - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)
[3220F-02 Svitnok - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)
[3220F-03 Marianivske - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)
[3220F-04 Rodina - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)
Importance: High

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for Ukrfield 3220F-01, 3220F-02, 3220F-03 and 3220F-04. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.com.tr , **Web:** www.etko.com.tr

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

	Notification of Noncompliance 3220F-03 TOV AGROFIRMA MARYANIVSKA	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Gamarc Vladimir Nikolaevich** Date: **17.11.2016**

On the dates (**09.09.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **09.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYÜZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-03 TOV AGROFIRMA MARYANIVSKA		Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Non-compliances:

Operator unit no.	3220F-03	Unit name	TOV AGROFIRMA MARYANIVSKA
Location - Adres	v.Maryanivka, Shyryaivskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-03.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	09.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

Issues: - Organic fertilizers were not assessed by ETKO before application.

- Plant protectors were not assessed by ETKO before application.

- Seeds were not approved by ETKO before sowing.

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Gamarc Vladimir Nikolaevich
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Corrective Action Plan by Operator

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

Target date	17.12.2016	Operator name and signature	Gamarc Vladimir Nikolaevich	Actual Completion date	
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Verification of Operator's corrective action and implementation by ETKO

Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

	Notification of Noncompliance 3220F-04 Rodina	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: [Salamaha Vasiliy Dmitrievich](#) Date: **17.11.2016**

On the dates (**08.09.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **08.09.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.12.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYÜZ](#) from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAAdverseActions@ams.usda.gov

Notification of Noncompliance 3220F-04 Rodina		Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

Operator unit no.	3220F-04	Unit name	Rodina
Location - Adres	v.Plahteivka, Saratskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-04.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a2)	NCR No 2016.1
Inspection Date	08.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-6.1, 7.7, 8.2	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

Issues: - Propagation Material Approval form is not done before sowing. Seeds were not approved by ETKO

- Organic fertilizers and plant protectors were not assessed by ETKO before application.

Inspector Name and signature	(b) (5), (b) (7)(C)	Operator name and signature	Salamaha Vasily Dmitrievich
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Corrective Action Plan by Operator

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

Target date	17.12.2016	Operator name and signature	Salamaha Vasily Dmitrievich	Actual Completion date	
-------------	------------	-----------------------------	-----------------------------	------------------------	--

Verification of Operator's corrective action and implementation by ETKO

Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
Explanations:					

Notification of Noncompliance 3220F-04 Rodina		Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	3/3

Operator unit no.	3220F-04	Unit name	Rodina
Location - Adres	v.Plahteivka, Saratskiy district, Odessa region, Ukraine		

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3220F-04.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.272a	NCR No 2016.2
Inspection Date	08.09.2016		
Date of Notification	17.11.2016	Due Date	17.12.2016
<input type="checkbox"/> Major		<input checked="" type="checkbox"/> Minor M1-5.12	
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.		
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.		
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>Issues: - Crops are not marked in the storages. Storages are not marked as organic.</p>			
Inspector Name and signature	(b) (5), (b) (7)(C)	Operator name and signature	Salamaha Vasily Dmitrievich
Corrective Action Plan by Operator			
Seeds, Organic fertilizers and plant protectors will be applied with ETKO approval in future.			
Target date	17.12.2016	Operator name and signature	Salamaha Vasily Dmitrievich
		Actual Completion date	

Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date	ETKO approval
Explanations:			

	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: **Alexey Kachkovskiy** Date: **17.10.2016**

On the dates (**07.10.2016**) ETKO Inspector **(b) (6), (b) (7)(C)**) realized a **surveillance inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated **07.10.2016** ETKO determined the outstanding non-compliance in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than **17.11.2016** (in 30 days, starting from the date of this notification)

ETKO
160 Sok. 13/3 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPCAAverseActions@ams.usda.gov

	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/3

Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a1)	NCR No 2016.1
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Inspection Date	07.10.2016		
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Date of Notification	12.10.2016	Due Date	12.11.2016
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<input type="checkbox"/> Majör	<input checked="" type="checkbox"/> Minör
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.
<input type="checkbox"/> Non-Organic product sales as organic.	
<input type="checkbox"/> Requirements of regulation or standard not applied	
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.	
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.	
<input type="checkbox"/> Misuse of the licenses and certificates	
<input type="checkbox"/> Production process plan not implemented.	

Description of Nonconformity by Inspector

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

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

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

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Kachkovskiy
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Corrective Action Plan by Operator

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Target date	12.11.2016	Operator name and signature	Alexey Kachkovskiy	Actual Completion date	
-------------	------------	-----------------------------	--------------------	------------------------	--

Verification of Operator's corrective action and implementation by ETKO

Accepted: YES <input type="checkbox"/>	NO <input type="checkbox"/>	Date		ETKO approval	
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Explanations:

Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
	Date	15.07.2015
	Rev	00
	Page	3/3

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.272(a)	NCR No 2016.2
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Inspection Date	07.10.2016		
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Date of Notification	17.10.2016	Due Date	17.11.2016
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<input type="checkbox"/> Majör	<input checked="" type="checkbox"/> Minör
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.
<input type="checkbox"/> Non-Organic product sales as organic.	
<input type="checkbox"/> Requirements of regulation or standard not applied	
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.	
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.	
<input type="checkbox"/> Misuse of the licenses and certificates	
<input type="checkbox"/> Production process plan not implemented.	

Description of Nonconformity by Inspector
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>Issue: A2.4 Instructions for transport companies about transportation organic goods are not in place</p>

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Kachkovskiy
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Corrective Action Plan by Operator

Target date	12.11.2016	Operator name and signature	Alexey Kachkovskiy	Actual Completion date	
-------------	------------	-----------------------------	--------------------	------------------------	--

Verification of Operator's corrective action and implementation by ETKO		
Accepted: YES <input type="checkbox"/> NO <input type="checkbox"/>	Date	ETKO approval
Explanations:		

From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: (b) (6) t
Subject: Notification of Non-Compliances_ VIP Group 3188D-01
Date: Monday, October 17, 2016 3:51:39 AM
Attachments: [image001.jpg](#)
[3188D-01 VIP Group - GP 18 F 10 Notification of Noncompliance NONC.PDF](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances for VIP Group 3188D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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From: [Ceren BAYAZIT](#)
To: [sm.ms.NOPACAAdverseActions](#)
Cc: (b) (6)
Subject: Notification of Resolution of Non-Compliances_ VIP Group 3188D-01
Date: Wednesday, January 18, 2017 10:39:54 AM
Attachments: [image001.jpg](#)
[NRONC 3188D-01 VIP Group.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Resolution of Non-Compliances for VIP Group 3188D-01. If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.com.tr , **Web:** www.etko.com.tr

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	Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/3

Dear Madam / Sir: **Alexey Kachkovskiy**

Date: **20.12.2016**

On the dates (**07.10.2016**) ETKO Inspector **(b) (6), (b) (7)(C)** realized a **surveillance inspection** to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report, ETKO determined the outstanding noncompliance in your operation(s) and notified you by Notification of Noncompliance, dated **17.10.2016**.

ETKO reviewed and evaluated your corrective actions and supporting documents submitted at the date, **12.12.2016** to close the outstanding noncompliance. The evaluation result is provided on the following pages.

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to **Mr. Mustafa AKYÜZ** from ETKO +90-232-3397606 or by email at: ma@etko.com.tr info@etko.com.tr .

Sincerely

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

Result of Evaluation:

- Closed noncompliance: **2**

NC number(s) : **2016.1, 2016.2** See below forms.

- Outstanding noncompliance : **None**

NC number(s) :

Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
	Date	15.07.2015
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	Page	2/3

Outstanding Non-compliances:

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.201(a1)	NCR No 2016.1
Inspection Date	07.10.2016		
Date of Notification	17.10.2016	Due Date	17.11.2016
<input type="checkbox"/> Majör		<input checked="" type="checkbox"/> Minör	
<input type="checkbox"/> Factors causing risk on the product		<input type="checkbox"/> Factors causing no risk on the condition of the product.	
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.		<input checked="" type="checkbox"/> Production process plan partly implemented.	
<input type="checkbox"/> Non-Organic product sales as organic.			
<input type="checkbox"/> Requirements of regulation or standard not applied			
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.			
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
<input type="checkbox"/> Misuse of the licenses and certificates			
<input type="checkbox"/> Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p>§205.201 Organic production and handling system plan.</p> <p>(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:</p> <p>(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;</p> <p>Issue: A5.3 Registration form of complaints and register are presented but there is no complaint procedure</p>			
Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Kachkovskiy
Corrective Action Plan by Operator			
Complaint procedure and registration form of complaints are to be sent.			
Target date	17.11.2016	Operator name and signature	Alexey Kachkovskiy
		Actual Completion date	12.12.2016

Verification of Operator's corrective action and implementation by ETKO			
Accepted: YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	19.12.2016
ETKO approval	Mustafa AKYÜZ		
Complaint procedure and registration form of complaints were provided. (See Annex-3)			

Notification of Noncompliance 3188D-01 VIP Group	Nr	GP 18 F 10
	Date	15.07.2015
	Rev	00
	Page	3/3

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

Initial Inspection <input type="checkbox"/>	Surveillance Inspection <input checked="" type="checkbox"/>	Report no 3188D-01.2016.ac
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Subject of nonconformity	Documentation	Std or reg. Art. nr. NOP 205.272(a)	NCR No 2016.2
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Inspection Date	07.10.2016
-----------------	------------

Date of Notification	17.10.2016	Due Date	17.11.2016
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<input type="checkbox"/> Majör	<input checked="" type="checkbox"/> Minör
<input type="checkbox"/> Factors causing risk on the product	<input type="checkbox"/> Factors causing no risk on the condition of the product.
<input type="checkbox"/> Use of inputs which are not allowed by the regulations.	<input checked="" type="checkbox"/> Production process plan partly implemented.
<input type="checkbox"/> Non-Organic product sales as organic.	
<input type="checkbox"/> Requirements of regulation or standard not applied	
<input type="checkbox"/> Frequent minor non-conformities on the same requirement of regulation.	
<input type="checkbox"/> Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.	
<input type="checkbox"/> Misuse of the licenses and certificates	
<input type="checkbox"/> Production process plan not implemented.	

Description of Nonconformity by Inspector	
<p>§205.272 Commingling and contact with prohibited substance prevention practice standard.</p> <p>(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.</p> <p>Issue: A2.4 Instructions for transport companies about transportation organic goods are not in place.</p>	

Inspector Name and signature	(b) (6), (b) (7)(C)	Operator name and signature	Alexey Kachkovskiy
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Corrective Action Plan by Operator	
<p>Instructions for transport companies about transportation organic goods are to be sent.</p>	

Target date	17.11.2016	Operator name and signature	Alexey Kachkovskiy	Actual Completion date	12.12.2016
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Verification of Operator's corrective action and implementation by ETKO						
Accepted:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Date	19.12.2016	ETKO approval	Mustafa AKYÜZ
<p>Explanations: Instructions for transport companies about transportation organic goods and a Declaration on this issue were provided. (See Annex 1 and 2)</p>						

	Notification of Noncompliance 2016F04 Yolyo Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: Shum Pavlo M. Kolajovych

Date: 01.06.2016

On the dates (12-13.05.2016) ETKO Inspector (b) (6), (b) (7)(C) realized a initial inspection to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

USDA National Organic Program

Based on the inspection report dated 12-13.05.2016 ETKO determined the outstanding noncompliances in your operation(s)

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

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

Or

- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

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

Your response must be submitted to the following address, not later than 01.07.2016 (in 30 days, starting from the date of this notification):

ETKO
100 Sok. 13/7 35040 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to M. Mustafa A-YUZ from ETKO +90-232-3397606 or by email at: ma@etko.org info@etko.org


Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team NOPACAZ@usda.gov

	Notification of Noncompliance 3216F-04 Volyn Agro	Nr	GP 18 F 10
		Date	15.07.2015
		Rev	00
		Page	2/2

Noncompliances:

Noncompliance No	1	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	12-13.05.2016
Date of Notification	01.06.2016		Due Date	01.07.2016
<p>§205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: <i>Except</i>, That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: <i>Except</i>, That, organically produced seed must be used for the production of edible sprouts;</p> <p>There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)</p>				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	834-Article 9, IACB 5.9
<p>Action taken Suppliers of seeds declared that their seeds are not GMO (see vendor declarations).</p>				
<p>Please identify the supporting documents, if any: 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed</p>				
Name, Surname and Signature of Appl. Resp.	Shum Pavlo Mykolajovich 		Date	05.06.2016
Review Date			Resolved	<input type="checkbox"/>
			Unresolved	<input type="checkbox"/>
<p>Review Comment:</p> <p>Reviewer name & signature:</p>				

From: [Ceren BAYAZIT](#)
To: sm.ms.NOPACAAdverseActions
Cc: ma@etko.org; fa@etko.org; volunagro@gmail.com
Subject: Notification of Non-Compliances & Resolution- VolynAgro 3216F-04
Date: Thursday, August 18, 2016 8:56:38 AM
Attachments: [image001.jpg](#)
[NRONC 3216F-04 VolynAgro.pdf](#)
[3216F-04 VolynAgro - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

Dear Sirs,

Please kindly find the attached Notification of Non-Compliances & Resolution for VolynAgro 3216F-04 (a farm of Sayvo 3216D-01). If you have any questions, please don't hesitate to contact me.

Thank you.

Saygilarimizla/ Best Regards

Ceren BAYAZIT



ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06, Fax: +90 (232) 339 76 07

Email/eposta: cb@etko.org, **Web:** www.etko.org

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	Notification of Resolution of Noncompliance 3216F-04 VolynAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	1/2

Dear Madam / Sir: **Shum Pavlo Mykolajovych**

Date: **18.08.2016**

On the date **(12-13.05.2016)** ETKO Inspector **(b) (6), (b) (7)(C)** realized **an initial inspection** to your operation. The objective of inspections were to determine your organic operation's compliance against the regulation:

USDA National Organic Program

Based on the inspection reports dated **above** ETKO determined the outstanding noncompliances in your file / operation(s)

ETKO reviewed and evaluated your corrective actions and supporting documents submitted during **this period** and subsequently to close the outstanding noncompliance's. The evaluation result is provided on the following pages.

If you have any questions regarding the evaluation results in relation to the corrective actions for the noncompliance please contact to Mr. Mustafa AKYÜZ from ETKO +90-232-3397606 or by email at:
ma@etko.org info@etko.org .

Sincerely
Mustafa Akyüz

Cc : NOPACAAdverseActions@ams.usda.gov

Result of Evaluation:

- Closed noncompliance: **1**

NC number(s) : **1 . See below forms**

- Outstanding noncompliance : **None**
NC number(s) :

	Notification of Resolution of Noncompliance 3216F-04 VolynAgro	Nr	GP 18 F 11
		Date	15.07.2015
		Rev	00
		Page	2/2

Resolved Noncompliances:

Noncompliance No	1	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Inspection Date	12-13.05.2016
Date of Notification	01.06.2016		Due Date	01.07.2016
Noncompliance : §205.204 Seeds and planting stock practice standard. (a) The producer must use organically grown seeds, annual seedlings, and planting stock: <i>Except</i> , That, (1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: <i>Except</i> , That, organically produced seed must be used for the production of edible sprouts; There are no vendor declarations for rapeseeds and corn (risky GMO crops in Ukraine)				
Inspection criteria	NOP reg. ref	205.204a(1)	ETKO rules ref.	834-Article 9, IACB 5.9
Action taken : Suppliers of seeds declared that their seeds are not GMO (see vendor declarations). Please identify the supporting documents, if any: 3216F-04 Volyn Agro - Vendor Declaration corn, 3216F-04 Volyn Agro - Vendor declaration rapeseed				
Name, Surname and Signature of Appl. Resp.	Shum Pavlo Mykolajovych		Date	05.06.2016
Review Date	18.08.2016		Resolved <input checked="" type="checkbox"/>	Unresolved <input type="checkbox"/>
Review Comment: Vendor Declarations for corn and rapeseed are attached. Suppliers of seeds declared that their seeds are not GMO. Reviewer name & signature: Fatih Aksoy				

From: [Mann, Renee - AMS](#)
To: [Claypool, Rebecca E - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with Claypool, Rebecca E - AMS
Date: Tuesday, September 27, 2016 3:45:42 PM

Mann, Renee - AMS 3:31 PM:

(b) (5). Again, you're providing a draft response to us first. Just confirming.

Mann, Renee - AMS 3:35 PM:

And we are going to send it through Miles, because it's a bit touchy.

Claypool, Rebecca E - AMS 3:42 PM:

SURE thing. RGK just pulled me away for a question, but I'm working on a draft and will send to you and Cheri first.

Mann, Renee - AMS 3:43 PM:

thxx
*thanks

From: [Claypool, Rebecca E - AMS](#)
To: [Claypool, Rebecca E - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with Claypool, Rebecca E - AMS
Date: Tuesday, November 01, 2016 3:42:38 PM

Claypool, Rebecca E - AMS 3:39 PM:

Hi Renee, Sorry to bug you. The 2 witness audits assigned to me for ETKO - Can they be combined into one NC report or keep them separate?

Mann, Renee - AMS 3:39 PM:

There should only be one... right? Are there two different audit IDs?

Claypool, Rebecca E - AMS 3:40 PM:

Same Audit IDs two different witness audits. I ask because I think I got 2 auto emails via workload tracking.

Mann, Renee - AMS 3:40 PM:

i think it's just 2 emails. When you go into the WTL does it show two lines or one?

Claypool, Rebecca E - AMS 3:42 PM:

Una!

Uno

Mann, Renee - AMS 3:42 PM:

yeeah - just weirdness with the database. IT's just one Witness Audit.

Claypool, Rebecca E - AMS 3:42 PM:

bueno!

From: [Mann, Renee - AMS](#)
To: [Swartwood, Stacy - AMS](#); [Mann, Renee - AMS](#)
Subject: Conversation with Swartwood, Stacy - AMS
Date: Thursday, December 22, 2016 2:44:29 PM

Mann, Renee - AMS 2:21 PM:

Where's the best place for me to view the current NOP certificate INTEGRITY issues?

Swartwood, Stacy - AMS 2:22 PM:

In terms of feedback or status of development activities?

Mann, Renee - AMS 2:22 PM:

Oh not even that complicated. I just want to see the template.
Whatever the current one is.

Swartwood, Stacy - AMS 2:23 PM:

Hmmm...probably in the Development or Test environment of the database
You can get into Dev at <http://172.16.1.186/OID/Default.aspx>
We've currently got VOF generating certificates, so you can pick the first operation in the list, and then select the "Print Certificate" link in the upper right corner of the Operation Profile
(clarification - VOF is not using the certificate module IRL, we just have them set to generate in the Development environment)
BTW - we are working on bunches of enhancements to the certificates module, like preview and download batches of certificates

Mann, Renee - AMS 2:26 PM:

ah thanks

Swartwood, Stacy - AMS 2:28 PM:

Is there a specific question I can help answer? This is one of our epic efforts, so there are lots of aspects to it.

Mann, Renee - AMS 2:29 PM:

no, but thanks. It's not really related to what you're up to. ;-)

(b) (5)

Swartwood, Stacy - AMS 2:29 PM:

Okaaay...

(b) (5)

I'll get that to you in just a sec
(we posted it for feedback)

Mann, Renee - AMS 2:31 PM:

ooooo. let me show you then.

GP 18 F 21 NOP Certificate 20161118.pdf

(b) (5)

Ugh, sorry. Just go to the last link and then click on the PDF called "GP 18 F 21 NOP Certificate..."

Swartwood, Stacy - AMS 2:32 PM:

(b) (5)

Mann, Renee - AMS 2:35 PM:

Is that a version of one of the certificates we've showed the certifiers? Or did they modify it?

Swartwood, Stacy - AMS 2:35 PM:

(b) (5)

Here's what we have available as a sample (one sec while I track down the URL)

Mann, Renee - AMS 2:36 PM:

k

I did just pull up the VOF one and it is quite modified.

Swartwood, Stacy - AMS 2:36 PM:

from their website?

talk about opening up a can of worms!

<https://www.cloudvault.usda.gov/index.php/s/soCcXCvf6Xdt5Uf>

Mann, Renee - AMS 2:37 PM:

Are you here in the office?

Swartwood, Stacy - AMS 2:37 PM:

no sorry ... telework

Mann, Renee - AMS 2:38 PM:

ha ok.

Swartwood, Stacy - AMS 2:38 PM:

i have a telephone...

Mann, Renee - AMS 2:38 PM:

What's your number?

Swartwood, Stacy - AMS 2:38 PM:

(b) (6)

Mann, Renee - AMS 2:40 PM:

ok, just a second

Swartwood, Stacy - AMS 2:41 PM:

(call)

Mann, Renee - AMS 2:43 PM:

(call)

From: [Lars Crail](#)
To: [Lars Crail](#); [Mann, Renee - AMS](#)
Subject: TDA Finding Examples
Date: Wednesday, January 11, 2017 9:55:50 AM

Lars Crail 9:49 AM:

Renee, I saw that the meeting with Tammy was rescheduled for this afternoon. I have a video meeting with a certifier at 12:00 pm, so I wanted to alert you that I may a little late in joining your meeting.

Mann, Renee - AMS 9:49 AM:

that's fine. I'm not even sure if it's happening. I've been having a hard time connecting with Tammie.

Lars Crail 9:50 AM:

I very much need to know whether I should schedule exporter visits in Istanbul other than those certified by ETKO.

The security situation in Istanbul is elevated and the RSO in the Turkey embassy is wanting more details of my activities.

Mann, Renee - AMS 9:52 AM:

ok. If Tammie isn't available today, you and I can talk. I can show you what she's found. And we could include Kay, who might be knowledgeable on the stuff Tammie has found.

Lars Crail 9:52 AM:

good. Thanks.

From: [RPost](#)
To: [Mann Renee - AMS](#)
Subject: Ack: Annual Report Acknowledgement
Date: Monday, March 10, 2014 10:38:42 AM

Acknowledgement: Your message has been sent

RPost will send a Registered Receipt™ record within two hours as your proof of delivery, content, and official time.

This message certifies that:

Your message (subject):	Annual Report Acknowledgement
To:	"ma@etko.org"
Cc:	
Was received by the registration service at:	3/10/2014 2:38:37 PM (UTC)* 3/10/2014 2:38:37 PM (Local)
Message ID:	0B11EC5FE152E3C437B23769591DB68DD61AB49E
Network ID:	<3C4DB283706AA94CB746BB337C77BE7430FB75@001FSN2MPN1-043.001f
Client Code:	

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An RPost Service

From: [Mann, Renee - AMS](#)
To: ma@etko.org
Subject: Annual Report Acknowledgement (Sent Registered)
Date: Monday, March 10, 2014 10:38:01 AM
Attachments: [ETKO AnnRptAckn MMK 031014.pdf](#)

Dear Dr. Akyuz:

Thank you for the submission of your annual report. The USDA National Organic Program has reviewed your report and found that ETKO has adequately complied with the annual reporting requirement. Please contact me with any questions you may have.

Sincerely,
Renee

Ms. Renee Mann
Accreditation Manager
USDA National Organic Program
(202) 260-8635 (Note new phone number)
[NOP website](#)

Sign up for our newsletter, the [USDA Organic Insider](#).



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOTICE OF ANNUAL REPORT

10 MAR 2014

Dr. Mustafa Akyuz
Ecological Farming Control Organization
Merkez ofis 160 sk No: 13/7
Bornova - Izmir, 35040
TURKEY

Dear Dr. Akyuz:

On January 23, 2014, the United States Department of Agriculture (USDA), National Organic Program (NOP) received the 2014 annual report from Ecological Farming Control Organization (ETKO). The NOP reviewed the report materials submitted and determined that ETKO has adequately complied with the annual reporting requirement (§ 205.510(a)). The report information will be verified during your next onsite audit.

If you have questions regarding this notice, please contact your Accreditation Manager, Renee Mann, at Renee.Mann@ams.usda.gov or (202) 260-8635.

Sincerely,

A handwritten signature in cursive script that reads "Cheri Courtney".

Cheri Courtney
Director, Accreditation and International Activities
National Organic Program

From: [Lusby, MaryLou - AMS](#)
To: [Essig, Mario - AMS](#)
Cc: [Mann, Renee - AMS](#)
Subject: Changes to ETKO address, State or Foreign countries in which they certify, and List of Certified Operations
Date: Friday, February 06, 2015 2:22:57 PM
Attachments: [ANNEX 7 ETKO Certified Operators List 2014.OK.pdf](#)
[image001.png](#)

Mario,

Changes below came from ETKO Annual Report that they submitted for 2015. Not sure how the changes are handed but they are below.

ETKO moved to a different location (Door number changed) but there are in the same building that they were in. (See Below)

This might require changes on the website

Any updates to the list of State or foreign countries in which the certifying agent certifies production and handling operations and a list of each State or foreign country in which the certifying agent intends to certify production or handling operations.

§205.504 Evidence of expertise and ability

Azerbaijan, Belarus, Bengladesh, Cote D'Ivoire, Cyprus, Egypt, Ethiopia, Georgia, India, Kazakhstan, Kirgizia, Korea, Pakistan, Romania, Russia, Serbia, Singapur, Tacikistan, Thailand, Turkey, Ukraine and Uzbekistan

Also have enclosed there List of Certified Operations the one highlighted belongs on the list (See below)

If you have any questions please let me know.

Thank you

Mary Lou Croisetiere



Mary Lou Croisetiere | Program Specialist, National Organic Program
USDA AMS | 100 Riverside Parkway Suite 101 Fredericksburg VA 22406 540-361-2712

MaryLou.Lusby@ams.usda.gov

From: ma@etko.org [mailto:ma@etko.org]

Sent: Friday, February 06, 2015 1:52 PM

To: Lusby, MaryLou - AMS

Subject: RE: ETKO Annual Report 2014-5

Ms Lusby

The address was changed as following: 160 Sokak 13/3, 35100 Bornova – Izmir.

The door number changed, we moved in the same building to another flat.

Yellow indication was simply forgotton, the client is certified. Yellow color shuld have been cleaned, but forgotton

Have a nice weekend,

Mustafa Akyuz

ETKO Certified Operators List 2014

No	License number	Name client	Area Certification	Nr of Handlers	Nr of Producers	Nr of Collectors	Date of Certification 2014
1	2009	Arisu – TURKEY	Processing	1	-	-	30.12.2014
2	2014	Mezo – TURKEY	Processing & crops and wild collection	1	15		30.12.2014
3	2044	Arif Gurdal – TURKEY	Crops	1	-		30.10.2014
4	2058	ETAP – TURKEY	Processing	1			30.12.2014
5	2070	Ozpa - TURKEY	Processing & crops	1			31.12.2014
6	2120	Treko – TURKEY	Processing & crops	1	360		20.11.2014
7	2158	Susitas – TURKEY	Processing & wild collection	1			30.12.2014
8	2190	Asya – TURKEY	Processing	1			24.09.2014
9	2203	Kalkan – TURKEY	Crops	1	74		30.12.2014
10	2314	Fine Food – TURKEY	Processing & crops	1			02.09.2014
11	2328	Taskin – TURKEY	Processing	1			30.12.2014
12	2387	Ares - TURKEY	Processing	1			31.07.2014
13	2391	Vahap Baran Baydoğan- TURKEY	Crops				12.12.2014
14	2453	Oliva Gıda Sanayi Tic.Ltd.Şti- TURKEY	Processing & crops	1			25.12.2014
15	2475	Meysan – TURKEY	Processing & crops	3	35		30.12.2014
16	2484	Meysüt - TURKEY	Processing	2			26.09.2014
17	2508	Kalkan Organik - TURKEY	Processing				30.12.2014
18	2516	Arın Gıda - TURKEY	Trade				01.11.2014
19	2527	Limkon – TURKEY	Processing	1			20.11.2014
20	2534	WBT – TURKEY	Processing	1			05.04.2014
21	2542	Ekoturka-TURKEY	Processing	2	21		18.02.2014
22	2573	Cafer İpek-TURKEY	Crops	1			19.07.2014
23	2629	Bio Naturel-TURKEY	Processing & crops				14.07.2014
25	2633	Ason-TURKEY	Processing				13.05.2014
26	2650	Dohler Marmara-TURKEY	Processing	1			07.12.2014
27	2654	Nigella-TURKEY	Processing	1			07.11.2014
28	2669	GKM-TURKEY	Processing	2			16.12.2014
29	3006	Spelta – UKRAINE	Trade	-	5	-	30.12.2014
30	3013	Alef Ltd.	Trade	-	10	-	15.12.2014
31	3020	Region Agro ltd.	Trade	-	-	-	20.10.2014
32	3026	Sibnut – RUSSIAA	Processing and wild collection	2	-	15	23.10.2014
33	3076	UFC – UKRAINE	Trade	-	5	-	30.12.2014
34	3077	TOO "PROIZVODSTVENNIY KOMPLEX "MOL-TABYS"	Trade	-			
35	3087	Yugekotoy – UKRAINE	Processing and crops	15	11	-	31.12.2013
36	3090	EVERI LTD.	Trade	-	9	-	15.09.2014
37	3092	GRAINAGRO LTD	Trade	-	8	-	09.12.2014
38	3093	Dnepr2 – UKRAINE	Trade	-	12	-	05.10.2014
39	3094	Polba – UKRAINE	Trade	-	4	-	30.12.2014
40	3096	El Dorado – UKRAINE	Trade	-	0	-	30.12.2014
41	3114	Farmeks – TURKEY	Trade	-	19		30.12.2014

42	3120	Sadeko Organic – UKRAINE	Trade	-	4	-	17.10.2014
43	3121	Ekoturka- ETHIOPIA	Crops	-	82	-	30.12.2014
44	3122	Do Cotton – TAJIKSTAN	Crops	-	103	-	30.12.2014
45	3126	Ekoturka- KIRGIZIA	Crops	1	4	-	30.12.2014
46	3127	Ekoturka- KAZAKHSTAN	Crops	1	20	-	30.12.2014
47	3128	Ekoturka-RUSSIA	Crops	1	4	-	30.12.2014
48	3140	Prodexim-UKRAINE	Trade	-	7	-	30.10.2014
49	3141	Ekolium – UKRAINE	Trade	-	-	-	27.11.2014
50	3142	Seomjingang Rose Farm – KOREA	Crops	-	17	-	29.12.2014
51	3149	Janghueng Musangim Co Ltd - KOREA	Crops	1	7	-	29.12.2014
52	3170	NT-NOVA LTD	Trade	-	-	-	25.08.2014
53	3172	ART SEED ltd.	Trade	-	4	-	29.09.2014
54	3180	KAZECOTRADE LTD.	Trade	-	4	-	15.12.2014
55	3193	OJSC Vinnytsa Oil-and-Fat-Production Plant	Processing	1	-	-	27.11.2014
56	3194	LLC NIKMORSERVICES NIKOLAEV	Trade	-	-	-	28.11.2014
57	3195	AGRO SUPPLIES LLC.	Trade	-	-	-	28.11.2014

ETKO Sanctioned & Surrendered operations in 2014 season

License number
3132
3138

Name Operator
RODINA Llc.
DAEHAN FEED

Comment
Surrendered
Surrendered

Name, address of operators production and processing units and products

1- 2009 ARISU

Processing units

Unit nr	Unit	Process	Address
2009D-01	Arisu Gida Dis Ticaret A.S.	Production and Export Of Organic Fruit Purees and Concentrates	Civil – Denizli / TURKEY

Products from other project

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

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

2-2014 MEZO

Processing units:

Unit nr	Unit	Process	Address
2014D-01	Mezo	Production and processing dried herbs, export, storage,	Antalya Org. San. Bol. 2. cad. WBT Tesisleri - Yenikoy - Antalya

Agricultural units:

Unit No	Unit name	Number of producers, hectar and crop	Status
2014F-10	Tefenni / BURDUR	7 üretici, (b) (4) ha. rezene, anason, fiğ, nohut, buğday, arpa	Org
2014F-10	Tefenni / BURDUR	3 üretici, (b) (4) ha. rezene, anason, arpa, şeker pancarı, slajlık mısır, hiyar, domates, biber	IC2
2014F-04	Antalya, Burdur, Mersin	7 üretici, Doğal toplama	Org

Products:

Product no	Name product	Last product	Status	Process no
2014P-01	Fennel	Dane	Organic	2014D-01
2014P-02	Wheat	Dane	Organic	2014D-01
2014P-03	Vetch	Dry ot	Organic	2014D-01
2014P-04	Barley	Dane	Organic	2014D-01
2014P-05	Chickpea	Dane	Organic	2014D-01
2014P-06	Anise	Dane	Organic	2014D-01
2014P-07	Ball Oregano - Oregano	Dry Leaves	Organic	2014D-01
2014P-08	Thyme - Savory	Dry Leaves	Organic	2014D-01
2014P-09	Sage	Dry Leaves	Organic	2014D-01
2014P-10	Bay	Dry Leaves	Organic	2014D-01
2014P-11	Rosemary	Dry Leaves	Organic	2014D-01
2014P-12	Myrtle leaf	Dry Leaves	Organic	2014D-01
2014P-13	Sumac	Dane	Organic	2014D-01
2014P-14	Carrageenan	Dry Leaves	Organic	2014D-01
2014P-15	Vitex agnus-castus	Dry Leaves	Organic	2014D-01
2014P-16	Locust	Fruit	Organic	2014D-01

3-ARIF GURDAL**Agricultural units:**

Unit nr	Unit	Total area, crops and farmers	Status
2044F-01 AG Organic Farm Facility	Aydın Baltaköy	1 producer, (b) (4) ha. Crops: Pomegranate.	Organic
2044F-01 AG Organic Farm Facility	Aydın İncirliova, H.Aliobası	1 producer, (b) (4) M ² . Crops: Pomegranate.	Organic
2044F-01 AG Organic Farm Facility	Koçarlı Kanlıazmak Mvk	1 producer, (b) (4) M ² . Crops: Pomegranate.	Organic

Processing units:

Unit nr	Unit	Process	Address
2044D-01	Arif Gurdal Organic Farm Facility	Documentation, Organisation, Marketing, Animal Farming.	Hamzabali Mevkii Baltakoy Vedat Ciftci Ciftligi Cine Yolu 8.km, AYDIN-TURKEY

Products

Product nr	Product	Final product	Status	Processing unit
2044P-01	Pomegranate	Fresh	ORG	2044D-01
2044P-02	Pomegranate	Fresh	In-Con	2044D-01

4-ETAP GIDA**Processing units:**

Unit nr	Unit	Process	Address
2058D-01	Anadolu Etap Tarım & Gıda Ürünleri Ambalaj San. Tic. A.Ş.	Marketing and processing of fruit juice, fruit juice concentrate, puree, transporting, and documentations.	Mersin – Tarsus Karayolu 10. km. Kazanlı Kavsagi, Mersin / TÜRKİYE

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
None			

Products

Product nr	Product	Final product	Status	Processing unit
2058P-01	Apple	Juice concentrate, puree	Organic	2058D-01
2058P-02	Apricot	Puree,20-22 bx,30-32 bx	Organic	2058D-01
2058P-03	Banana	Puree	Organic	2058D-01
2058P-04	Black carrot	Juice concentrate	Organic	2058D-01
2058P-05	Blackberry,	Puree	Organic	2058D-01
2058P-06	Black mulberry	Puree	Organic	2058D-01
2058P-07	Fig	Puree	Organic	2058D-01
2058P-08	Grape	Juice	Organic	2058D-01
2058P-09	Grapefruit	Juice concentrate, cloudy conc., peel oil and cell	Organic	2058D-01
2058P-10	Lemon	Juice concentrate, cloudy conc., peel oil and cell	Organic	2058D-01
2058P-11	Mandarin	Juice concentrate	Organic	2058D-01
2058P-12	Orange	Juice concentrate, cloudy conc., comminuted, peel oil and cell	Organic	2058D-01
2058P-13	Peach	Puree,20-22 bx,30-32 bx	Organic	2058D-01
2058P-14	Pear	Concentrate	Organic	2058D-01
2058P-15	Plum	Puree,20-22 bx,30-32 bx	Organic	2058D-01

2058P-16	Pomegranate	Juice, Concentrate	Organic	2058D-01
2058P-17	raspberry	Puree	Organic	2058D-01
2058P-18	Red beet	Juice concentrate	Organic	2058D-01
2058P-19	Sour cherry	Concentrate, puree	Organic	2058D-01
2058P-20	Strawberry	Puree	Organic	2058D-01
2058P-21	Tomato	Puree	Organic	2058D-01

5-2070 ÖZPA

Processing units:

Unit nr	Unit	Process	Address
2070D-01	ÖZPA GIDA TARIM HAYVANCILIK İNŞ. SAN. ve TİC. A.Ş.	Production, documentation and marketing,	Cumhuriyet Köyü Yıldırım Çiftliği Mah. ÖZPA Tarım İşletmesi Eskisehir/ TURKEY

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
2070F-01	ÖZPA GIDA TARIM HAYV. İNŞ. SAN. ve TİC. A.Ş.	1 producer, total area ^(b) ⁽⁴⁾ hectares. Organic Summer and Winter Vegetables, Fruits Productions.	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
2070P-01	Almonds	Fresh	Organic	----
2070P-02	Apple	Fresh	Organic	----
2070P-03	Apricot	Fresh	Organic	----
2070P-04	Bell pepper	Fresh	Organic	----
2070P-05	Blackberry	Fresh	Organic	----
2070P-06	Celery	Fresh	Organic	----
2070P-07	Cherry	Fresh	Organic	----
2070P-08	Cucumber	Fresh	Organic	----
2070P-09	Eggplant	Fresh	Organic	----
2070P-10	Garlic	Fresh	Organic	----
2070P-11	Golden berry	Fresh	Organic	----
2070P-12	Grapes	Fresh	Organic	----
2070P-13	Leek	Fresh	Organic	----
2070P-14	Melon	Fresh	Organic	----
2070P-15	Mulberry (Black-white)	Fresh	Organic	----
2070P-16	Okra	Fresh	Organic	----

2070P-17	Onion	Fresh	Organic	----
2070P-18	Parsley	Fresh	Organic	----
2070P-19	Peach	Fresh	Organic	----
2070P-20	Pears	Fresh	Organic	----
2070P-21	Pepper	Fresh	Organic	----
2070P-22	Plum	Fresh	Organic	----
2070P-23	Potato	Fresh	Organic	----
2070P-24	Pumpkin	Fresh	Organic	----
2070P-25	Quince	Fresh	Organic	----
2070P-26	Raspberries	Fresh	Organic	----
2070P-27	Red Pepper	Fresh	Organic	----
2070P-28	Sour Cherry	Fresh	Organic	----
2070P-29	Squash	Fresh	Organic	----
2070P-30	Tomato	Fresh	Organic	----
2070P-31	Walnut	Fresh	Organic	----
2070P-32	Watermelon	Fresh	Organic	----

6- 2120 TREKO

Processing units:

Unit nr	Unit	Process	Address
2120D-01	Treko Tarım Gıda İc ve Dis Ticaret Ltd. Sti.	Documentation, organization, marketing, export	Ali Cetinkaya Bulvarı No: 34 K: 4 D: 401 Alsancak - İzmir / TURKEY
2120D-02	Limkon Gıda San. ve Tic. A.Ş.	Documentation, Export, Fruit juice concentrate, Import & Export of organic products, marketing	Adana Hacı Sabancı Organize Sanayi Bölgesi Adana-Ceyhan Yolu Üzeri 28. Km Yakapınar – Adana / Türkiye

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
2120F-04	Çankırı	267 farmers, (b) (4) Hectares Apple productions	Organic
2120F-05	Alaşehir	104 farmers (b) (4) Hectares Apple productions	Organic
2120F-06	Çine	13 farmers, (b) (4) Hectares Apple productions	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
2120P-01	Apple	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2120D-02

2120P-02	Pears	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2120D-02
2120P-03	Quince	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-04	Pomegranate	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-05	Grapefruit	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-06	Orange	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-07	Lemon	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-08	Mandarin	Concentrate, NFC fruit juice, Aroma		2120D-02
2120P-09	Carrots	Concentrate, Aroma		2120D-02
2120P-10	Black Carrots	Concentrate, Aroma		2120D-02
2120P-11	Strawberry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-12	Sour Cherry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-13	Cherry	Concentrate, Puree, NFC fruit juice, Aroma		2120D-02
2120P-14	Tomato	Concentrate, Puree, Aroma		2120D-02
2120P-15	Apricot	Concentrate, Puree, Aroma		2120D-02
2120P-16	Peaches	Concentrate, Puree, Aroma		2120D-02

7-SUSİTAŞ

Processing units:

Unit nr	Unit	Process	Address
2158D-01	SUSİTAŞ su ürünleri ve san. mamülleri ihracat tic. a.ş.	Documentation, organization of collectors, canning of capers.	AOSB 10040 sk. No:25 Çiğli-İzmir

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2158F-01	Manisa	(b) (4) ha, capers, 4 chief collectors	Org

Products:

Product nr	Product	Final product	Status	Processing unit
2158P-01	Capers	*Canned (in jars, tins, pet buckets, gallons, barrels)	Org	2158D-01

8-2190 ASYA MEYVE SULARI

Processing units:

Unit nr	Unit	Process	Address
2190D -01	Asya Meyve Suyu ve Gıda Sanayi A.Ş.	Processing of Fruit juice concentrate and puree	Tepeli Köyü Mevkii – Eğirdir / ISPARTA

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

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

9-2203 KALKAN

Processing units:

Unit nr	Unit	Process	Address
2203D - 01	Kalkan sebze Meyve Hay. Nak. Trz. İnş. San. Tic. Ltd. Şt.	Processing (IQF), production, Organization, freezing (IQF), marketing	Yeniköy – Akşehir/ KONYA

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2203F-01	Akşehir-Konya / TURKEY	74 producers, fruits production	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
2203P-01	Strawberry	Fresh, IQF	Organic	2203D – 01
2203P-02	Cherry	Fresh, IQF	Organic	2203D – 01
2203P-03	Sour cherry	Fresh, IQF	Organic	2203D – 01
2203P-04	Apple	Fresh	Organic	2203D – 01
2203P-05	Pear	Fresh	Organic	2203D – 01
2203P-06	Plum	Fresh	Organic	2203D – 01
2203P-07	Grape	Fresh	Organic	2203D – 01

10- 2314 FINEFOOD

Processing units:

Unit nr	Unit	Omitted Activity – Material	Justification
2314D-02	Fine Food A.Ş.	Processing (IQF), marketing, documentation, organization	Conventional Processing (IQF)

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
2314F-01	Fine Food A.Ş.	1 producer, (b) (4) ha. Crops: Peas	Organic
		1 producer, (b) (4) ha. Crops: Beans	Organic
		1 producer, (b) (4) ha. Crops: Pepper CW	Organic

Procuts:

Product nr	Product	Final product	Status	Processing unit
2314P-01	Broccoli	IQF	Organic	2314D-01
2314P-02	Capia Pepper	IQF	Organic	2314D-01
2314P-03	Cherry	IQF	Organic	2314D-01
2314P-04	Corn	IQF	Organic	2314D-01
2314P-05	Green Pepper	IQF	Organic	2314D-01
2314P-06	Onions	IQF	Organic	2314D-01
2314P-07	Peas	IQF	Organic	2314D-01
2314P-08	Sour cherry	IQF	Organic	2314D-01
2314P-09	Strawberry	IQF	Organic	2314D-01
2314P-10	Tomatoes	IQF	Organic	2314D-01

11-2328TASKIN TARIM

Processing units:

Unit nr	Unit	Process	Address
2328D-01	Taşkın Tarım	Processing (Drying), Packing, Storing, Marketing and Export of Organic Fruits	Gediz – Kütahya

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2328F-01	Kütahya	14 poducers, (b) (4) ha fruit productions	Organic

Products:

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

*: Products will be bought from other projects as certified

12-2387 ARES**Agricultural units:**

No	Unit name	Number of producers, hectare and crop	Status
None			

Processing units:

Unit nr	Unit name	Process	Address
2387D-01	ARES ORGANİK GIDA TEK. SAN. Ve DIŞ TIC. LTD. ŞTİ.	Documentation, Marketing	Alıntepe Mah. İstasyon yolu sok. No:3 Maltepe/ ISTANBUL - TURKEY

Products:

Product no	Name product	Last product	Status	Process no
2387P-01	Anise	Seed	Organic	2387D-01
2387P-02	Apple	Dried	Organic	2387D-01
2387P-03	Apricot	IQF, Dried, Kernel, Halves in (Water with syrup), Jam	Organic	2387D-01
2387P-04	Black Cherry (Red, Dark)	IQF	Organic	2387D-01
2387P-05	Blackberries	IQF, Jam	Organic	2387D-01
2387P-06	Blueberry	IQF	Organic	2387D-01
2387P-07	Boulghour	Grain	Organic	2387D-01
2387P-08	Broccoli	IQF	Organic	2387D-01
2387P-09	Carrot	IQF	Organic	2387D-01
2387P-10	Chestnut	Dried	Organic	2387D-01
2387P-11	Chickpeas	Pulses	Organic	2387D-01
2387P-12	Cumin	Seed	Organic	2387D-01
2387P-13	Fennel	Seed	Organic	2387D-01
2387P-14	Figs	Dried, Jam	Organic	2387D-01
2387P-15	Grapefruit	Segment in juice/syrup	Organic	2387D-01
2387P-16	Green lentil	Grain	Organic	2387D-01
2387P-17	Hazelnut	Dried	Organic	2387D-01
2387P-18	Laurel	Leaves	Organic	2387D-01
2387P-19	Leek	IQF	Organic	2387D-01
2387P-20	Linden	Leaves, Flowers	Organic	2387D-01
2387P-21	Mahleb	Seed	Organic	2387D-01
2387P-22	Mandarin	Segment in juice/syrup	Organic	2387D-01
2387P-23	Mint	Leaves	Organic	2387D-01
2387P-24	Nigella	Seed	Organic	2387D-01
2387P-25	Olive	Oil, Seedless, Pepper, Almond, Jam, Paste	Organic	2387D-01
2387P-26	Onion	IQF	Organic	2387D-01
2387P-27	Orange	Segment in juice/syrup	Organic	2387D-01
2387P-28	Oregano	Seed	Organic	2387D-01
2387P-29	Paper (Red, Yellow, Green)	IQF	Organic	2387D-01
2387P-30	Peach	IQF, Jam	Organic	2387D-01
2387P-31	Pear	IQF	Organic	2387D-01

13- 2391 Vahap Baran BAYDOĞAN

Agricultural units

No	Unit name	Number of producers, hectare and crop	Status
2391F-01	Vahap Baran Baydoğan	1 Producer, (b) (4) da, Olive Cultivation	Organic
		1 Producer, (b) (4) da, Olive Cultivation	IC 3

Processing units

Ünit nr	Unit name	Process	Address
2391D-01	ARES ORGANİK GIDA TEK. SAN. Ve DIŞ TIC. LTD. ŞTİ.	Documentation, Marketing	Alıntintepe Mah. İstasyon yolu sok. No:3 Maltepe/ İSTANBUL - TURKEY

Products

Product no	Name product	Last product	Status	Process no
2391P-01	Olive	Fresh	Organic	2387D-01
2391P-02	Olive Oil	Olive Oil	Organic	2387D-01

14- 2453 OLİVA GIDA

Agricultural units

No	Unit name	Number of producers, hectare and crop	Status
2453F-01	Çine-AYDIN	1 Üretici, (b) (4) da, Zeytin	Geçiş 2
2453F-02	Çine-AYDIN	1 Üretici (b) (4) da, Zeytin	Geçiş 3

Processing units

Ünit nr	Unit name	Process	Address
2453D-01	OLİVA GIDA	Yıkama, Kırma, Ayırma, Stoklama, Paketleme, Dokümantasyon, satış	İzmir Yolu Üzeri 4. km.Gaye Sanayi Sitesi Karşısı Söke-AYDIN

Products

Product no	Name product	Last product	Status	Process no
2453P-01	Olive	Olive Oil	IC2	2453D-01
2453P-02	Olive	Olive Oil	IC3	2453D-01

15-2475 MEYSAN

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2475F-01	TİRE	26 Producers, (b) (4) da, Figs	Organic
2475F-01	TİRE	10 Producers, (b) (4) da, Figs	IC 2
2475F-01	TİRE	14 Producers, (b) (4) da, Walnut	Organic
2475F-01	TİRE	7 Producers, (b) (4) da, Walnut	IC 2
2475F-01	TİRE	23 Producers, (b) (4) da, Olive	Organic
2475F-01	TİRE	4 Producers, (b) (4) da, Olive	IC 2
2475F-02	MALATYA	11 Producers, (b) (4) da, Apricots	Organic
2475F-02	MALATYA	3 Producers, (b) (4) da, Apricots	IC 3
2475F-02	MALATYA	5 Producers, (b) (4) da, Apricots	IC 2
2475F-02	MALATYA	6 Producers, (b) (4) da, Apricots	IC 1

Processing units

Unit nr	Unit	Process	Address
2475D-01	MEY-SAN ORGANİK GIDA TARIM ÜRÜNLERİ SAN. TİC. LTD. ŞTİ.	Processing, marketing, documentation, organization	Sarıoğlu Mah. Otcu 1 sok, Kayısı İhracatçıları İş Merkezi No: 43, Malatya
2475D-02	BAŞARAN TARIM ÜRÜNLERİ TİC. LTD.ŞTİ.	Processing, documentation,	Ayfer Sok. No:13 Ege Serbest Bölgesi Gaziemir- İZMİR
2475D-03	MAMÜR (KAYISI ÇEKİRDEK ALIM VE İŞLEMESİ)	Processing, documentation,	Yağmurlu mah. Akçadağ-MALATYA

Products

Product nr	Product	Final product	Status	Processing unit
2475P-01	Figs	Dried	Organic	2475D-01, 02
2475P-02	Walnut	Dried	Organic	2475D-01, 02
2475P-04	Chestnut	Fresh	Organic	2475D-01, 02
2475P-05	Olive	Fresh	Organic	2475D-01, 02
2475P-12	Apricots	Dried	Organic	2475D-01, 02
2475P-13	Apricot Kernels	Dried	Organic	2475D-01, 02
2475P-14	Raisins*	Dried	Organic	2475D-01, 02
2475P-15	Apricots**	Dried	Organic	2475D-01, 02
2475P-16	Diced Apricots**	Dried	Organic	2475D-01, 02

2475P-17	Apricot Paste* *	Dried	Organic	2475D-01, 02
2475P-18	Figs**	Dried	Organic	2475D-01, 02
2475P-19	Diced Figs**	Dried	Organic	2475D-01, 02
2475P-20	Dried Fig Paste **	Dried	Organic	2475D-01, 02
2475P-21	Dried Mulberries*	Dried	Organic	2475D-01, 02
2475P-22	Dried Sour Cherry *	Dried	Organic	2475D-01, 02
2475P-23	Sultana Raisins (Dipped)*	Dried	Organic	2475D-01, 02, 03
2475P-24	Sultana Raisins* (Undipped))	Dried	Organic	2475D-01, 02, 03
2475P-25	Dried Tomatoes*	Dried	Organic	2475D-01, 02
2475P-26	Dried Plums *	Dried	Organic	2475D-01, 02
2475P-27	Dried Plum Paste *	Dried	Organic	2475D-01, 02
2475P-28	Fruit Mix *	Dried	Organic	2475D-01, 02
2475P-29	Dried Apples *	Dried	Organic	2475D-01, 02
2475P-30	Dried Peach *	Dried	Organic	2475D-01, 02
2475P-31	Chickpeas*	Dried	Organic	2475D-01, 02
2475P-32	Red Lentils *	Dried	Organic	2475D-01, 02
2475P-33	Green Lentils*	Dried	Organic	2475D-01, 02
2475P-34	Beans*	Dried	Organic	2475D-01, 02
2475P-35	Bulgur*	Dried	Organic	2475D-01, 02
2475P-36	Apricot Kernels **	Dried	Organic	2475D-01, 02
2475P-37	Apricot Kernel Oil *	Yağ (Oil)	Organic	2475D-01, 02
2475P-38	Hazelnut Kernels *	Dried	Organic	2475D-01, 02
2475P-39	Roasted Hazelnut Kernels*	Dried	Organic	2475D-01, 02
2475P-40	Hazelnut Kernels Powder*	Dried	Organic	2475D-01, 02
2475P-41	Pistachios*	Dried	Organic	2475D-01, 02
2475P-42	Pine nut*	Dried	Organic	2475D-01, 02
2475P-43	Almond*	Dried	Organic	2475D-01, 02
2475P-44	Chestnut*	Dried	Organic	2475D-01, 02
2475P-45	Blue Poppy Seeds*	Dried	Organic	2475D-01, 02
2475P-46	White Poppy Seeds*	Dried	Organic	2475D-01, 02
2475P-47	IQF Strawberries*	Frozen	Organic	2475D-01, 02
2475P-48	IQF Sweet Cherries*	Frozen	Organic	2475D-01, 02
2475P-49	IQF Apricots*	Frozen	Organic	2475D-01, 02
2475P-50	IQF Plums*	Frozen	Organic	2475D-01, 02
2475P-51	IQF Sour Cherries*	Frozen	Organic	2475D-01, 02
2475P-52	IQF Peaches*	Frozen	Organic	2475D-01, 02

2475P-53	IQF Raspberry*	Frozen	Organic	2475D-01, 02
2475P-54	IQF Tomatoes*	Frozen	Organic	2475D-01, 02
2475P-55	IQF Red Pepper*	Frozen	Organic	2475D-01, 02
2475P-56	Apple Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-57	Sour Cherry Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-58	Pomegranate Juice **Concentrate	Concentrate	Organic	2475D-01, 02
2475P-59	Pear Juice Concentrate*	Concentrate	Organic	2475D-01, 02
2475P-60	Apricot Puree*	Puree	Organic	2475D-01, 02
2475P-61	Apple Puree*	Puree	Organic	2475D-01, 02
2475P-62	Peach Puree*	Puree	Organic	2475D-01, 02
2475P-63	Pear Puree*	Puree	Organic	2475D-01, 02
2475P-64	Strawberry Puree*	Puree	Organic	2475D-01, 02
2475P-65	Plum Puree*	Puree	Organic	2475D-01, 02
2475P-66	Cherry Puree*	Puree	Organic	2475D-01, 02
2475P-67	Raspberry Puree *	Puree	Organic	2475D-01, 02

16- 2484 MEYSÜT

Processing units:

Unit nr	Unit	Process	Address
2484D-01	Meysüt Gıda ve Makina San. ve Tic. Ltd. Şti.	Organization, documentation, marketing	Dumlupınar Mah. 1522 Sok. No 2 Görman Apt. Kat 1 / 4 MERSİN - TURKEY
2484D-02	GKM Gıda Maddeleri Sanayi Tic. Ltd.Şti	Processing, storing, organization, documentation	Dumlupınar mah 1522 sok No 2 Göknan Apt. Kat ¼ MERSİN

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

Product nr	Product	Final product	Status	Processing unit
2484P-01	Carob Fruit	Locust Bean Gum	Organic	2484D-02
2484P-02	Carob Fruit	Kibbled Carob Cubes	Organic	2484D-02
2484P-03	Carob Fruit	Carob Germ	Organic	2484D-02
2484P-04	Carob Fruit	Toasted Carob Powder	Organic	2484D-02
2484P-05	Carob Fruit	Carob Molasses	Organic	2484D-02
2484P-06	Carob Fruit	Clear Carob Syrup	Organic	2484D-02
2484P-07	Carob Fruit	Carob Fiber	Organic	2484D-02

17-2508 KALKAN TARIM

Processing unit:

Unit nr	Unit	Process	Address
2508D-01	Kalkan organik Ltd. Şti.	Processing, Production, Documentation, Marketing	Nazilli - Aydın TURKIYE

Agriculture units:

Unit nr	Unit	Total area, crops and farmers	Status
2508F-01	Kalkan organik Ltd. Şti.	11 Producers, (b) (4) ha, Olive, Fig, Chestnut	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
2508P-01	Figs	Dried	Organic	2508D-01
2508P-02	Apricots	Dried	Organic	2508D-01

18-2516 ARIN GIDA

Processing units:

Ünite numarası	Ünite	Proses	Adres
2516D-01	Arın Gıda Dis Ticaret A.S.	Processing of Fruit concentrate and puree	Civril – Denizli / TURKEY

Agriculture units:

Unit nr	Unit	Total area, crops and farmers	Status
None			

Products:

Product nr	Product	Final product	Status	Processing unit
2516P-01	Apple	Concentrate, fresh	Organic	2009D-01
2516P-02	Cherry	Concentrate, fresh	Organic	2009D-01
2516P-03	Peach	Concentrate, fresh	Organic	2009D-01
2516P-04	Apricots	Concentrate, fresh	Organic	2009D-01
2516P-05	Pear	Concentrate, fresh	Organic	2009D-01
2516P-06	Quince	Concentrate, fresh	Organic	2009D-01
2516P-07	Strawberries	Concentrate, fresh	Organic	2009D-01
2516P-08	Pomegranate	Concentrate, fresh	Organic	2009D-01
2516P-09	Black Carrot	Concentrate, fresh	Organic	2009D-01

19-2527 LIMKON

Processing units:

Unit nr	Unit	Process	Address
2527D-01	LİMKON GIDA SAN. VE TİC .AŞ	Import , export, processing documentation , marketing	Adana Hacı Sabancı OrganizeSanayi Bölgesi

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
None			

Products:

Product nr	Product	Final product	Status	Processing unit
2527P-01	Apple	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-02	Pears	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-03	Quince	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-04	Pomegranate	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-05	Grapefruit	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-06	Orange	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-07	Lemon	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-08	Mandarin	Concentrate, NFC fruit juice, Aroma	Organic	2527D-01
2527P-09	Carrots	Concentrate, Aroma	Organic	2527D-01
2527P-10	Black Carrots	Concentrate, Aroma	Organic	2527D-01
2527P-11	Strawberry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-12	Sour Cherry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-13	Cherry	Concentrate, Puree, NFC fruit juice, Aroma	Organic	2527D-01
2527P-14	Tomato	Concentrate, Puree, Aroma	Organic	2527D-01
2527P-15	Apricot	Concentrate, Puree, Aroma	Organic	2527D-01
2527P-16	Peaches	Concentrate, Puree, Aroma	Organic	2527D-01

20-2534 WBT**Processing units:**

Unit nr	Unit name	Process	Address
2534D-01	WBT	Processing, production, storing, marketing, documentation	Organize San. 2. cad. No: 10 – ANTALYA

Agriculture units:

No	Unit name	Number of producers, hectare and crop	Status
-			

Products:

Product no	Name product	Last product	Status	Process no
2534P-01	Anise	Seed	Organic	2534D-01
2534P-02	Bay	Leaves	Organic	2534D-01
2534P-03	Carob	Powder	Organic	2534D-01
2534P-04	Cistus	Leaves	Organic	2534D-01
2534P-05	Cumin	Seed	Organic	2534D-01
2534P-06	Fennel	Seed	Organic	2534D-01
2534P-07	Myrtle	Leaves	Organic	2534D-01
2534P-08	Oregano	Leaves	Organic	2534D-01
2534P-09	Poppy	Seed	Organic	2534D-01
2534P-10	Rosemary	Leaves	Organic	2534D-01
2534P-11	Sage	Leaves	Organic	2534D-01
2534P-12	Savory	Leaves	Organic	2534D-01
2534P-13	Sumac	Powder	Organic	2534D-01
2534P-14	Thyme	Leaves	Organic	2534D-01
2534P-15	Vitex	Seeds	Organic	2534D-01

21 - 2542 EKOTURKA

Processing units:

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

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

Product nr	Product	Final product	Status	Processing unit
2542P-01	Barley	Grain	Organic	2542D-01, 02
2542P-02	Beans	Bean	Organic	2542D-01, 02
2542P-03	Chickpea	Pea	Organic	2542D-01, 02
2542P-04	Corn	Grain	Organic	2542D-01, 02
2542P-05	Cotton	Lint	Organic	2542D-01, 02
2542P-06	Hazelnuts	Kernel	Organic	2542D-01, 02
2542P-07	Kidney Bean	Bean	Organic	2542D-01, 02
2542P-08	Lentils Green	Grain	Organic	2542D-01, 02
2542P-09	Lentils Red	Grain	Organic	2542D-01, 02
2542P-10	Lentils Yellow	Grain	Organic	2542D-01, 02
2542P-11	Linseed	Grain	Organic	2542D-01, 02
2542P-12	Millet	Grain	Organic	2542D-01, 02
2542P-13	Mung Beans	Bean	Organic	2542D-01, 02
2542P-14	Mustard	Grain	Organic	2542D-01, 02
2542P-15	Oat	Grain	Organic	2542D-01, 02
2542P-16	Peas	Pea	Organic	2542D-01, 02
2542P-17	Pistachios	Kernel	Organic	2542D-01, 02
2542P-18	Rapeseeds	Grain	Organic	2542D-01, 02
2542P-19	Rice	Grain	Organic	2542D-01, 02
2542P-20	Rye	Grain	Organic	2542D-01, 02
2542P-21	Safflower	Grain	Organic	2542D-01, 02

2542P-22	Sesame	Grain	Organic	2542D-01, 02
2542P-23	Sorghum	Grain	Organic	2542D-01, 02
2542P-24	Soybean	Bean	Organic	2542D-01, 02
2542P-25	Sunflower Seeds	Kernel	Organic	2542D-01, 02
2542P-26	Vetch Seeds	Grain	Organic	2542D-01, 02
2542P-27	Wheat	Grain	Organic	2542D-01, 02

22- 2573 CAFER İPEK

Processing units:

Unit nr	Unit	Process	Address
-	-	-	-

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2573F-01	Cafer İPEK – Dereçine – Sultandağı / AFYON KARAHİSAR/ TURKEY	1 manufacturer, (b) (4) ha. Fruit production	Organic

Products:

Product no	Name product	Last product	Status	Process no
2573P-01	Almonds	Crusted	Organic	-
2573P-02	Apple	Fresh	Organic	-
2573P-03	Apricots	Fresh	Organic	-
2573P-04	Blackberry	Fresh	Organic	-
2573P-05	Cherry	Fresh	Organic	-
2573P-06	Grapes	Fresh	Organic	-
2573P-07	Mulberry	Fresh	Organic	-
2573P-08	Nectarine	Fresh	Organic	-
2573P-09	Peach	Fresh	Organic	-
2573P-10	Pears	Fresh	Organic	-
2573P-11	Plum	Fresh, dried	Organic	-
2573P-12	Quince	Fresh	Organic	-
2573P-13	Sour Cherry	Fresh	Organic	-
2573P-14	Walnut	Crusted	Organic	-

23-2629 BIO NATURAL

Processing units:

Unit nr	Unit	Process	Address
-	-	-	-

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2629F-01	Ali KARA – Yukarıkaşıkara – Yalvaç / ISPARTA	1 manufacturer, (b) (4) ha Apple, Apricot production	Organic

Products:

Product no	Name product	Last product	Status	Process no
2629P-01	Apple	Fresh	IC2	-
2629P-02	Apricot	Fresh	IC2	-

24-2630 BAHÇECİ TARIM

Processing units:

Unit nr	Unit	Process	Address
2630D-01	Bahceci tarım urunleri tic ltd sti	Marketing, Storage, Accounting,	Balçova - İzmir
2630D-02	Yosun tarım	Processing, Packaging, Storage	Yüreğir / Adana

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Products:

Product no	Name product	Last product	Status	Process no
2630-P01	%3 Copper	Okey	organic	2630-D01

25- 2633 ASON**Processing units:**

Unit nr	Unit	Process	Address
2633D-01	Ason Dış Ticaret Limited Şirketi	Marketing, transporting, and documentations.	Caddebostan Mah. Cami Sk. Edsan Apt. No:3 D:2, Kadıköy - İstanbul

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Products:

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

2633P-26	Soybeans	Pulses	Organic	2633D-01
2633P-27	Kidney Beans	Pulses	Organic	2633D-01
2633P-28	Rice	Grain	Organic	2633D-01
2633P-29	Sesame	Dried	Organic	2633D-01
2633P-30	Figs	Dried	Organic	2633D-01
2633P-31	Apricots	Dried	Organic	2633D-01
2633P-32	Grape	Dried	Organic	2633D-01
2633P-33	Plum	Dried	Organic	2633D-01
2633P-34	Mulberry	Dried	Organic	2633D-01

26- 2650 DOHLER MARMARA

Processing units:

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

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Products:

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

2650P-08	Carrot Puree Concentrate	Puree Concentrate 20-22 Brix	ORGANIC	2650D-01
2650P-09	Red Pepper Puree Concentrate	Puree Concentrate 18-20 Brix	ORGANIC	2650D-01
2650P-10	Red Pepper Puree Concentrate	Puree Concentrate 22-24 Brix	ORGANIC	2650D-01
2650P-11	Black Mulberry Puree	Puree SS 11-15 Brix	ORGANIC	2650D-01
2650P-12	Peach Puree Concentrate	Puree Concentrate 20-22 Brix	ORGANIC	2650D-01
2650P-13	Peach Puree Concentrate	Puree Concentrate 30-32 Brix	ORGANIC	2650D-01
2650P-14	Peach Puree	Puree SS 8,5-11,5	ORGANIC	2650D-01
2650P-15	Pear Puree	Puree SS 11-17	ORGANIC	2650D-01
2650P-16	Pear Puree Concentrate	Puree Concentrate 30-32 Brix	ORGANIC	2650D-01
2650P-17	Plum Puree	Puree SS 10-18 Brix	ORGANIC	2650D-01
2650P-18	Quince Puree	Puree SS 11-15 Brix	ORGANIC	2650D-01
2650P-19	Quince Puree Concentrate	Puree Concentrate 20-22 Brix	ORGANIC	2650D-01
2650P-20	Sour Cherry Puree	Puree SS 16-24 Brix	ORGANIC	2650D-01
2650P-21	Sour Cherry Puree Concentrate	Puree Concentrate 30-32 Brix	ORGANIC	2650D-01
2650P-22	Sweet Cherry Puree Concentrate	Puree Concentrate 30-32 Brix	ORGANIC	2650D-01

27- NIGELLA

Processing units:

Unit nr	Unit	Process	Address
2654D-01	Nigella Tarım Hayvancılık Gıda Peyzaj İnş. San. Tic. Ltd. Şti.	Documentation, Marketing	İstiklal Mah Reşadiye Cad. Yelkovan İş Merkezi Kat :4 No:1 Eskişehir-TURKEY

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Products:

Product no	Name product	Last product	Status	Process no
2654P-01	Pears	Fresh	ORGANIC	-
2654P-02	Raspberries	Fresh	ORGANIC	-
2654P-03	Grapes	Fresh	ORGANIC	-
2654P-04	Quince	Fresh	ORGANIC	-
2654P-05	Almonds	Fresh	ORGANIC	-
2654P-06	Blackberry	Fresh	ORGANIC	-
2654P-07	Walnut	Fresh	ORGANIC	-
2654P-08	Mulberry	Fresh	ORGANIC	-
2654P-09	Apple	Fresh	ORGANIC	-
2654P-10	Plum	Fresh	ORGANIC	-
2654P-11	Apricot	Fresh	ORGANIC	-
2654P-12	Cherry	Fresh	ORGANIC	-
2654P-13	Peaches	Fresh	ORGANIC	-
2654P-14	Sour Cherry	Fresh	ORGANIC	-
2654P-15	Eggplant	Fresh	ORGANIC	-
2654P-16	Pumpkin	Fresh	ORGANIC	-
2654P-17	Cucumber	Fresh	ORGANIC	-
2654P-18	Tomato	Fresh	ORGANIC	-
2654P-19	Okra	Fresh	ORGANIC	-

2654P-20	Potato	Fresh	ORGANIC	-
2654P-21	Parsley	Fresh	ORGANIC	-
2654P-22	Red Pepper	Fresh	ORGANIC	-
2654P-23	Celery	Fresh	ORGANIC	-
2654P-24	Leek	Fresh	ORGANIC	-
2654P-25	Golden Berry	Fresh	ORGANIC	-
2654P-26	Stuffed Pepper	Fresh	ORGANIC	-
2654P-27	Cayenne Pepper	Raisin	ORGANIC	-
2654P-28	Melon	Fresh	ORGANIC	-
2654P-29	Watermelon	Fresh	ORGANIC	-
2654P-30	Onion	Fresh	ORGANIC	-
2654P-31	Garlic	Fresh	ORGANIC	-
2654P-32	Corn	Fresh	ORGANIC	-
2654P-33	Spinach	Fresh	ORGANIC	-
2654P-34	Broccoli	Fresh	ORGANIC	-
2654P-35	Cauliflower	Fresh	ORGANIC	-
2654P-36	Peas	Fresh	ORGANIC	-
2654P-37	Organic Tarhana	Organic Tarhana	ORGANIC	-
2654P-38	Organic Tomato Sauce	Organic Tomato Sauce	ORGANIC	-
2654P-39	Organic Pepper Sauce	Organic Pepper Sauce	ORGANIC	-
2654P-40	Organic Hot Sauce	Organic Hot Sauce	ORGANIC	-
2654P-41	Organic Eggplant with Basil Sauce	Organic Eggplant with Basil Sauce	ORGANIC	-
2654P-42	Organic Apple Vinegar	Organic Apple Cider Vinegar	ORGANIC	-
2654P-43	Organic home-made pasta (noodles)	Organic home-made pasta (noodles)	ORGANIC	-
2654P-44	Grape Vinegar	Grape Vinegar	ORGANIC	-
2654P-45	Boiled Grape Juice	Boiled Grape Juice	ORGANIC	-
2654P-46	Mixed pickles	Mixed pickles	ORGANIC	-
2654P-47	Tomatoes	Dried	ORGANIC	-

2654P-48	Golden Berry	Dried	ORGANIC	-
2654P-49	Boiled Apple juices	Boiled Apple juices	ORGANIC	-

28- 2669 GKM

Processing units:

Unit nr	Unit	Process	Address
2669D-01	Meysut Gıda Mak. Sanayi Tic. Ltd.Şti	Processing, Organization, Quality Systems, Storage, Marketing	Dumlupınar mah 1522 sok No 2 Gorman Apt. Kat ¼, Mersin TURKEY
2669D-02	GKM Gıda Mad. Sanayi Tic. Ltd.Şti	Processing, Storage, Marketing	Dumlupınar mah 1522 sok No 2 Gorman Apt. Kat ¼, Mersin TURKEY

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-	-	-	-

Products:

Product no	Name product	Last product	Status	Process no
2669P-01	Carob Fruit	Locust Bean Gum	ORGANIC	2669D-01,02
2669P-02	Carob Fruit	Kibbled Carob Cubes	ORGANIC	2669D-01,02
2669P-03	Carob Fruit	Carob Germ	ORGANIC	2669D-01,02
2669P-04	Carob Fruit	Toasted Carob Powder	ORGANIC	2669D-01,02
2669P-05	Carob Fruit	Carob Molasses	ORGANIC	2669D-01,02
2669P-06	Carob Fruit	Clear Carob Syrup	ORGANIC	2669D-01,02
2669P-07	Carob Fruit	Carob Fiber	ORGANIC	2669D-01,02

29-3006 SPELTA

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3006F-04	Novopetrovskoye - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3006F-05	EF Kahovskiy - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3006F-18	Ingulets - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3006F-19	Nadiya - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3006F-20	Shedriy Lan - Kherson	(b) (4) ha arable fields, 1 producer	ORG

Processing units:

Unit nr	Unit	Process	Address
3006D-01	Spelta Ltd.	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	2 Frunze Str., 73002 Kherson, Ukraine

Products:

Product nr	Product	Final product	Status	Processing unit
3006P-01	Barley	Seeds	Org	3006D-01
3006P-02	Corn	Seeds	Org	3006D-01
3006P-03	Flax	Seeds	Org	3006D-01
3006P-04	Mustard	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-05	Peas	Seeds	Org	3006D-01
3006P-06	Rapeseed	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-07	Sunflower	Seeds, Oil and Cake/expeller	Org	3006D-01
3006P-08	Walnut	Kernel	Org	3006D-01
3006P-09	Wheat	Seeds	Org	3006D-01

30-3013 Alef Ltd.**Agricultural units:**

Unit nr	Unit	Total area, crops and farmers	Status
3013F-24	FH "Don"- Lugansk	(b) (4) ha arable fields, 1 producer	Org
3013F-26	TOV Agrofirma "Kalmychanka" - Lugansk	ha arable fields, 1 producer	Org
3013F-27	FH "Vdovenko"- Lugansk	ha arable fields, 1 producer	Org
3013F-28	STOV AF "Zakotnenskaya"	ha arable fields, 1 producer	Org
3013F-29	TOV "Ros Agro" - Kirovograd	ha arable fields, 1 producer	Org
3013F-30	TzOV "Lyubava-Agro" - Ternopil	ha arable fields, 1 producer	Org
3013F-31	TOV "Agrofirma Druzba" - Kiev	ha arable fields, 1 producer	Org
3013F-32	TOV "Agroalyans" - Kherson	ha arable fields, 1 producer	Org
3013F-33	OOO SHP "Novaya Ukraina" - Kiev	ha arable fields, 1 producer	Org
3013F-34	TDV "Kolos" - Kirovograd	ha arable fields, 1 producer	Org

Processing units

Unit nr	Unit	Process	Address
3013D-01	ALEF ltd.	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	46, Sovetskaya str., Kherson, , 73000, Ukraine

Products:

Product nr	Product	Final product	Status	Processing unit
3013P-01	Alfa-alfa	Seeds, feed	Org	3013D-01
3013P-02	Barley	Seeds	Org	3013D-01
3013P-03	Buckwheat	Seeds	Org	3013D-01
3013P-04	Cheak-pea	Seeds	Org	3013D-01
3013P-05	Corn	Seeds	Org	3013D-01
3013P-06	Flax	Seeds	Org	3013D-01
3013P-07	Grape	Fresh	Org	3013D-01
3013P-08	Lentil	Seeds	Org	3013D-01
3013P-09	Lupine	Seeds	Org	3013D-01
3013P-10	Millet	Seeds	Org	3013D-01
3013P-11	Mustard	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-12	Oat	Seeds	Org	3013D-01
3013P-13	Peas	Seeds	Org	3013D-01
3013P-14	Rapeseed	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-15	Rye	Seeds	Org	3013D-01
3013P-16	Sorghum	Seeds	Org	3013D-01
3013P-17	Soybean	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-18	Sunflower	Seeds, Oil, Cake/expeller	Org	3013D-01
3013P-19	Vegetables	Fresh	Org	3013D-01
3013P-20	Walnut	Kernel	Org	3013D-01
3013P-21	Wheat	Seeds	Org	3013D-01

31-3020 Region Agro Ltd.

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
NA			

Processing units

Unit nr	Unit	Process	Address
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3020D-01	Region Agro ltd.	Import-export, trader, finance, documentation, forwarding, investment, organizing farms and processors	10, Naftovykiv str., Kherson, Ukraine
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Products

Product nr	Product	Final product	Status	Processing unit
3020P-01	Alfa-alfa	Seeds, cake	ORG	3020D-01
3020P-02	Barley	Seeds	ORG	3020D-01
3020P-03	Buckwheat	Seeds	ORG	3020D-01
3020P-04	Corn	Seeds, oil, cake	ORG	3020D-01
3020P-05	Flax	Seeds	ORG	3020D-01
3020P-06	Millet	Seeds	ORG	3020D-01
3020P-07	Mustard	Seeds, oil, cake	ORG	3020D-01
3020P-08	Oat	Seeds	ORG	3020D-01
3020P-09	Peas	Seeds	ORG	3020D-01
3020P-10	Rapeseeds	Seeds, oil, cake	ORG	3020D-01
3020P-11	Rye	Seeds	ORG	3020D-01
3020P-12	Safflower	Seeds, oil, cake	ORG	3020D-01
3020P-13	Sorghum	Seeds	ORG	3020D-01
3020P-14	Soybean	Seeds, oil, cake	ORG	3020D-01
3020P-15	Sunflower	Seeds, oil, cake	ORG	3020D-01
3020P-16	Wheat	Seeds	ORG	3020D-01

32-3026 SIBNUT

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3026F-01	Altai Region, Ongudai	(b) (4) ha. Cedar nut kernels, 15 collectors unit	Organic

Processing units

Unit nr	Unit	Process	Address
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3026D-01	SIBNUT LTD	Cedar nut process, documentation, organization, marketing, export, trading.	Russland, 630501 Elitnoe villige, Novosibirsk district ul. Polevaya Str. 30 Russia
3026D-02	KERN LTD.	Documentation, organization of collectors.	Altai region, Ongudai Russia

Products

Product nr	Product	Final product	Status	Processing unit
3026P-01	Cedar Pine Nut Kernel	Nuts	ORG	3026D-01, 02
3026P-02	Cedar Pine Nut Kernel Oil	Oil	ORG	3026D-01, 02

33 - 3076 UFC

Agricultural units:

No	Unit name	Number of producers, hectar and crop		Status
3076F-01	S000 Ptakhivnyk - Kherson	(b) (4)	ha arable fields, 1 producer	Org
3076F-02	000 TD GRAH - Kherson		ha arable fields, 1 producer	Org
3076F-03	Askania-Nova OPH - Kherson		ha arable fields, 1 producer	Org
3076F-04	Prodexim CD - Kherson		ha arable fields, 1 producer	Org
3076F-05	Lana Podove - Kherson		ha arable fields, 1 producer	Org

Processing units:

Unit nr	Unit name	Process	Address
3076D-01	Ukrainian Food Corporation LLC	Export, trade, administration, organizing farms and processors, transport, storage, finance	5, Port-Elevator, Kherson, 73000, Ukraine

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3076P-01	Alfa-alfa	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-02	Barley	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-03	Cherry	Fresh	A,D,E	ORG	3076D-01
3076P-04	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3076D-01
3076P-05	Flax	Seeds	A,D,E	ORG	3076D-01
3076P-06	Grape	Fresh	A,D,E	ORG	3076D-01
3076P-07	Millet	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-08	Peach	Fresh	A,D,E	ORG	3076D-01
3076P-09	Peas	Seeds, grouts	A,D,E	ORG	3076D-01
3076P-10	Pumpkin	Kernel	A,D,E	ORG	3076D-01
3076P-11	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-12	Strawberry	Fresh	A,D,E	ORG	3076D-01
3076P-13	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-14	Walnut	Kernel	A,D,E	ORG	3076D-01
3076P-15	Wheat	Seeds, grouts, flour meal	A,D,E	ORG	3076D-01
3076P-16	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01
3076P-17	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3076D-01

34-3077 TOO PROIZVODSTVENNIY KOMPLEX MOL-TABYS**Agricultural units:**

No	Unit name	Number of producers, hectar and crop	Status
3077F-01	TOO "IshimAgroNord"	(b) (4) ha arable fields, 1 producer	Org
3077F-02	TOO "JNV"	(b) (4) ha arable fields, 1 producer	Org

Processing units:

Unit nr	Unit name	Process	Address
3077D-01	TOO «Proizvodstvenniy complex "Mol Tabys»	Import-export, Trader, Documentation, Finance, Investment, Forwarding, Transshipment, Organizing farms and processors, Storage	1 proezd Universalniy str., 23, Petropavlovsk, Severo-Kazakhstanskiy region, Republic Kazakhstan

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3077P-01	Barley	Seeds, grouts	A,D	ORG	3077D-01
3077P-02	Camelina	Seeds	A	ORG	3077D-01
3077P-03	Chick-pea	Seeds	A	ORG	3077D-01
3077P-04	Flax	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-05	Mustard	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-06	Oat	Seeds, flour	A,D	ORG	3077D-01
3077P-07	Peas	Seeds, grouts	A,D	ORG	3077D-01
3077P-08	Rapessed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3077D-01
3077P-09	Rye	Seeds, grouts, flour	A,D	ORG	3077D-01
3077P-10	Wheat	Seeds, grouts, flour	A,D	ORG	3077D-01

35-3087 YUGEKOTOP

Agriculturel units:

Unit No	Unit name	Total area, crops and farmers	Status
3087F-01	"Krynichanskoe" – Nikolaev	(b) (4) ha arable fields, 1 producer	Org
3087F-02	"Dovira+" – Nikolaev	ha arable fields, 1 producer	Org
3087F-03	"Edem" – Nikolaev	ha arable fields, 1 producer	Org
3087F-04	"Ukragroinvest-Holding" – Jitomyr	ha arable fields, 1 producer	Org
3087F-05	"Dobrobut" – Kirovograd	ha arable fields, 1 producer	Org
3087F-09	Plasa - Odessa	ha arable fields, 1 producer	Org
3087F-10	Serbinova - Odessa	ha arable fields, 1 producer	Org
3087F-11	TOV NIK-AGRO – Nikolaev	ha arable fields, 1 producer	Org
3087F-12	TOV Promin – Nikolaev	ha arable fields, 1 producer	Org
3087F-13	PSP Agro Urojay – Nikolaev	ha arable fields, 1 producer	Org
3087F-14	TOV Stebne – Cherkassy	ha arable fields, 1 producer	Org

Processing units:

Unit no	Unit name	Process	Address
3087D-01	Yugekotop ltd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	4/4, Lyagina str., office 301, Nikolaev, 54001 Ukraine (old - Ukraine, 54055, Nikolaev, Sevastopolskaya str., 66-B)
3087D-02	SC Agrocontract ltd.	Storage and transshipment	89, Kosmonavtov str., Nikolaev, Ukraine

3087D-03	SGS Ukraine	Inspection	40/42, Atamana Golovatogo str., Odessa, Ukraine
3087D-05	"Kalina Torg Plus" ltd.	Seeds processing, oil and cake production	135, Kirova str., v.Voskresenskoe, Nikolaev region, 57210 Ukraine
3087D-06	Orexim Limited	Financing, foreign trader	66-B, Sevastopolskaya str., Nikolaev, 54055, Ukraine
3087D-07	NikaTransGroup ltd.	Storage and transshipment	1-A, Morekhnodnaya str., Nikolaev, 54003 Ukraine
3087D-08	Intertek Ukraine	Inspection	115, Chermonorskogo Kazachestva str., Odessa, Ukraine
3087D-09	Everi ltd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	14, Gmyreva str., Nikolaev, Ukraine
3087D-10	Snita Ltd	Process seed, oil and cake production	4, Promyshlennaya str., Bashtanka, 56100, Ukraine
3087D-11	Novomyrgorodskiy Sugar Factory	Process sugar, sugar beet pulp cake/expeller, sugar beet pulp molasses	v.Kapitonivka, Novomyrgorodskiy area, Kirovograd region, Ukraine
3087D-12	Fozzy-Food	Import-export, trading, finance, forwarding	5, Promyshlennaya str., t.Vyshnevoe, Kiev region, 08132, Ukraine
3087D-13	Weltop	Import-export, trading, finance, forwarding	39/41, Shota Rustaveli str., Kiev, 01019, Ukraine
3087D-14	PP ATK-Dnipro	Seeds processing, oil and cake production	34 Trolleybusnaya str., Zaporozhye, 69008 Ukraine
3087D-15	Oliynyi Dom LTD	Seeds processing, oil and cake production	135, Lenina str., v.Lofovotka, Krivorozhskiy district, Dnepropetrovsk region, 53020 Ukraine
3087D-16	Nikolaev MEZ LTD	Seeds processing, oil and cake production	117 Geroev Stalingrada Ave., 54025, Nikolaev, Ukraine

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3087P-01	Alfa-alfa	Seeds and cake/expeller	A,E	ORG	3087D-01-16
3087P-02	Barley	Seeds	A	ORG	3087D-01-16
3087P-03	Corn	Seeds	A	ORG	3087D-01-16
3087P-04	Flax	Seeds, oil and cake/expeller	A,E	ORG	3087D-01-16
3087P-05	Lupine	Seeds	A	ORG	3087D-01-16
3087P-06	Millet	Seeds	A	ORG	3087D-01-16
3087P-07	Peas	Seeds	A	ORG	3087D-01-16
3087P-08	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3087D-01-16
3087P-09	Sorghum	Seeds	A	ORG	3087D-01-16
3087P-10	Sugarbeet	Cake/expeller and pulp/molasses/pellets	A,E	ORG	3087D-01-16
3087P-11	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3087D-01-16
3087P-12	Wheat	Seeds	A	ORG	3087D-01-16

36-3090 EVERI LTD.

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3090F-01	Strumok - Odessa	(b) (4) ha arable fields, 1 producer	Org
3090F-02	Perlyna Strumka - Odessa	ha arable fields, 1 producer	Org
3090F-03	Dzherelo - Odessa	ha arable fields, 1 producer	Org
3090F-04	Vapet - Odessa	ha arable fields, 1 producer	Org
3090F-05	SK im.Shevchenko - Odessa	ha arable fields, 1 producer	Org
3090F-06	Glubokoe - Odessa	ha arable fields, 1 producer	Org
3090F-07	SFH Rusev - Odessa	ha arable fields, 1 producer	Org
3090F-08	Strumok Agroservice - Odessa	ha arable fields, 1 producer	Org
3090F-09	Dalakov P.D. - Odessa	ha arable fields, 1 producer	Org

Processing units:

Unit nr	Unit name	Process	Address
3090D-01	Everi ltd.	Import-export, trading, finance, documentation, organizing farms and processors, forwarding	117, Grazhdanskaya str., Mykolayiv, Ukraine

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3090P-01	Alfalfa	Seeds, hay, pellets	A,D,E	ORG	3090D-01
3090P-02	Barley	Seeds	A	ORG	3090D-01
3090P-03	Corn	Seeds	A	ORG	3090D-01
3090P-04	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-05	Lupine	Seeds	A	ORG	3090D-01
3090P-06	Oat	Seeds	A	ORG	3090D-01
3090P-07	Peas	Seeds	A	ORG	3090D-01
3090P-08	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-09	Rye	Seeds	A	ORG	3090D-01
3090P-10	Sorghum	Seeds	A	ORG	3090D-01
3090P-11	Sugarbeet	Seeds, cake/expeller, Pulp pellets/molasses	A,D,E	ORG	3090D-01
3090P-12	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3090D-01
3090P-13	Walnut	Kernel	A	ORG	3090D-01
3090P-14	Wheat	Seeds	A	ORG	3090D-01

37-3092 GRAINAGRO LTD

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3092F-02	"Maryanivske" - Odessa	(b) (4) ha arable farming, 1 producer	Org
3092F-03	"Rodina" - Odessa	ha arable farming, 1 producer	Org
3092F-06	LTD "Agro-DIS" - Odessa	ha arable farming, 1 producer	Org
3092F-07	"Svitanok" - Odessa	ha arable farming, 1 producer	Org
3092F-08	"Dobrobut" - Poltava	ha arable farming, 1 producer	Org
3092F-09	PP "Yuran" - Lugansk	ha arable farming, 1 producer	Org
3092F-10	TOV Agrofirma "LBB" - Lugansk	ha arable farming, 1 producer	Org
3092F-11	TOV "Suvorova" - Lugansk	ha arable farming, 1 producer	Org

Processing units:

Unit nr	Unit name	Process	Address
3092D-01	«Grainagro» ltd.	Import-export, Trader, , Finance, Documentation, Forwarding, Investment, Organizing farms and processors	12, Shevchenko avenue. off. 2., Odessa, 65058 Ukraine

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3092P-01	Barley	Seeds	A,D,E	ORG	3092D-01
3092P-02	Buckwheat	Seeds	A,D	ORG	3092D-01
3092P-03	Corn	Seeds	A,D,E	ORG	3092D-01
3092P-04	Flax	Seeds	A,D,E	ORG	3092D-01
3092P-05	Lupine	Seeds	A,E	ORG	3092D-01
3092P-06	Millet	Seeds	A,D,E	ORG	3092D-01
3092P-07	Mustard	Seeds	A,D,E	ORG	3092D-01
3092P-08	Oat	Seeds	A,D,E	ORG	3092D-01
3092P-09	Peas	Seeds	A,D,E	ORG	3092D-01
3092P-10	Rapeseed	Seeds	A,D,E	ORG	3092D-01
3092P-11	Rye	Seeds	A,D,E	ORG	3092D-01
3092P-12	Sorghum	Seeds	A,D,E	ORG	3092D-01
3092P-13	Sunflower	Seeds	A,D,E	ORG	3092D-01
3092P-14	Wheat	Seeds	A,D,E	ORG	3092D-01

38-3093 DNEPR2

Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3093F-03	Borozenske SVK - Kherson	(b) (4) ha arable fields, 1 producer	ORG
3093F-09	Krynytsya - Kherson	ha arable fields, 1 producer	ORG
3093F-11	Agrofirma Slavutich - Kirovograd	ha arable fields, 1 producer	ORG
3093F-20	Oasis - Odessa	ha arable fields, 1 producer	ORG
3093F-21	Osnova - Nikolaev	ha arable fields, 1 producer	ORG
3093F-22	MTD - Nikolaev	ha arable fields, 1 producer	ORG
3093F-29	Vidrodzhennya PSP - Nikolaev	ha arable fields, 1 producer	ORG
3093F-30	Rosiya PSP - Nikolaev	ha arable fields, 1 producer	ORG
3093F-31	Zorya AK Ltd. - Kirovograd	ha arable fields, 1 producer	ORG
3093F-32	Roznoshenske Ltd. – Kirovograd	ha arable fields, 1 producer	ORG
3093F-33	Myr AF Ltd. – Kirovograd	ha arable fields, 1 producer	ORG
3093F-34	Rozkishna AK Ltd. – Kirovograd	ha arable fields, 1 producer	ORG

Processing units:

Unit nr	Unit name	Process	Address
3093D-01	Dnepr-2	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	10 Naftovykiv str., Kherson, Ukraine
3093D-03	Region-Agro ltd	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	10 Naftovykiv str., Kherson, Ukraine
3093D-06	Amiranda	Internal control, transport, administration, sampling	33 Zhukovskogo str., office 403, Odessa, Ukraine
3093D-09	Plant Breeding & Genetic Institute	Breeding and multiplication of original (and commercial) seed (wheat, barley, peas, sunflower, corn, soybean etc.)	3, Ovidiopolskaya road, Odessa, 65036 Ukraine
3093D-14	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelna Str., Kherson, Ukraine, 73011

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3093P-01	Alfa-alfa	Cake	A,D	ORG	3093D-01,03,06,09-14,20-26

3093P-02	Barley	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-03	Buckwheat	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-04	Corn	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-05	Mustard	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-06	Peas	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-07	Rapeseeds	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-08	Safflower	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-09	Sorghum	Seeds	A	ORG	3093D-01,03,06,09-14,20-26
3093P-10	Soybean	Seeds, oil, cake	A	ORG	3093D-01,03,06,09-14,20-26
3093P-11	Sunflower	Seeds, oil, cake	A,D,E	ORG	3093D-01,03,06,09-14,20-26
3093P-12	Wheat	Seeds	A	ORG	3093D-01,03,06,09-14,20-26

*Oil and seed cake will be produced from the raw quantity mentioned above

39-3094 POLBA

Processors:

Unit nr	Unit name	Process	Address
3094D-01	Polba PE	Import-export, documentation, finance, forwarding, investment, organizing farms and processors	2 Frunze Str., Kherson, Ukraine, 73002

Production unit:

No	Unit name	Number of producers, hectar and crop	Status
3094F-01	PE Agrofirma «Pancheve»	(b) (4) ha arable fields, 1 producer	ORG
3094F-02	Agrofirma Chkalova Ltd.	(b) (4) ha arable fields, 1 producer	ORG
3094F-03	PE Agrofirma «Mytrofanivska»	(b) (4) ha arable fields, 1 producer	ORG
3094F-04	PE Agrofirma «Prestyzh»	(b) (4) ha arable fields, 1 producer	ORG

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3094P-01	Alfa-alfa	Seeds, cake	A,E	ORG	3094D-01
3094P-02	Barley	Seeds	A	ORG	3094D-01
3094P-03	Corn	Seeds	A	ORG	3094D-01
3094P-04	Soybean	Seeds, oil, cake	A,D,E	ORG	3094D-01
3094P-05	Sugarbeet	Cake	A,E	ORG	3094D-01
3094P-06	Sunflower	Seeds, oil, cake	A,E	ORG	3094D-01
3094P-07	Wheat	Seeds	A	ORG	3094D-01

40-3096 EL DORADO OIL**Agricultural units:**

Unit nr	Unit	Total area, crops and farmers	Status	Farmer number
NA				

Processing units:

Unit nr	Unit name	Process	Address
3096D-01	El Dorado Oils llc.	Export, trade, administration, finance, organizing farms and processors, transport, storage	8A, Rizhskaya Str., Kyiv, 04112 Ukraine

Products

Product no	Name product	Last product	Product Category	Status	Process no
3096P-01	Barley	Seeds, grouts	A,E	ORG	3096D-01
3096P-02	Buckwheat	Seeds, grouts	A,E	ORG	3096D-01
3096P-03	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-04	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-05	Millet	Seeds, grouts	A,E	ORG	3096D-01
3096P-06	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-07	Oat	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-08	Peas	Seeds, grouts	A,E	ORG	3096D-01
3096P-09	Pumpkin	Kernel	A	ORG	3096D-01
3096P-10	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01

3096P-11	Rye	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01
3096P-12	Sorghum	Seeds, grouts	A,E	ORG	3096D-01
3096P-13	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-14	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3096D-01
3096P-15	Walnut	Kernel	A	ORG	3096D-01
3096P-16	Wheat	Seeds, grouts, flour meal	A,D,E	ORG	3096D-01

41-3114 FARMEKS

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3114F-01	Urgut-Semerkant/ Özbekistan	(b) (4) ha arable fields, 14 producer	Organic
3114F-02	Fergana -Özbekistan	(b) (4) ha arable fields, 4 producer	Organic
3114F-03	Karakalpak-Özbekistan	ha arable fields, 1 producer	Organic

Processing units

Unit nr	Unit	Process	Address
3114D-01	Farmeks	Documentation, Marketing, Processing, Packing	Ege Serbest Bölgesi, Gaziemir, İzmir - TURKEY

Products

Product Nr	Product	Final product	Status	Processing unit
3114P-01	Grape	Dried	Organic	3114D-01
3114P-02	Apple	Dried	Organic	3114D-01
3114P-03	Apricots	Dried	Organic	3114D-01
3114P-04	Mulberry	Dried	Organic	3114D-01
3114P-05	Sour cherry	Dried	Organic	3114D-01
3114P-06	Walnut	Dried	Organic	3114D-01
3114P-07	Pears	Dried	Organic	3114D-01
3114P-08	Beans	Grain	Organic	3114D-01
3114P-09	Tomatoes	Dried	Organic	3114D-01
3114P-10	Plum	Dried	Organic	3114D-01

3114P-11	Almonds	Dried	Organic	3114D-01
3114P-12	Mung Beans	Dried	Organic	3114D-01
3114P-13	Kidney Bean	Dried	Organic	3114D-01
3114P-14	Licorice Root	Dried	Organic	3114D-01

42-3120 SADEKO

Agricultural units:No	Unit name	Number of producers, hectar and crop	Status
3120F-01	Rin-Agro - Kherson	(b) (4) ha arable fields, 1 producer	Org
3120F-03	Universal Expo - Kherson	ha arable fields, 1 producer	Org
3120F-04	TOV Shestirnia - Dnepropetrovsk	ha arable fields, 1 producer	Org
3120F-06	TOV Inter - Kherson	ha arable fields, 1 producer	Org

Processors:

Unit nr	Unit name	Process	Address
3120D-01	Sadeko Organic Ltd.	Import-export, trader, forwarding, investment, documentation, finance, organizing farms and processors	14, Parovozna str, Kherson, Ukraine
3120D-02	PrAT "Dneprovskiy terminal"	Forwarding, transportation	169 Perekopskaya str., Kherson, Ukraine
3120D-12	Art Seed ltd.	Import-export, trading, documentation, financing	14, Parovozna str, Kherson, Ukraine
3120D-14	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelna Str., Kherson, Ukraine, 73011

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3120P-01	Barley	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-02	Beans	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-03	Buckwheat	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-04	Chick-pea	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-05	Coriander	Seeds	A,D,E	ORG	3120D-01 - 14
3120P-06	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-07	Flax	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-08	Lentil	Seeds, grouts	A,D,E	ORG	3120D-01 - 14

3120P-09	Lupine	Seed	A,D,E	ORG	3120D-01 - 14
3120P-10	Millet	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-11	Mustard	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-12	Oat	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-13	Peas	Seeds, grouts	A,D,E	ORG	3120D-01 - 14
3120P-14	Pumpkin	Seeds, kernel	A,D	ORG	3120D-01 - 14
3120P-15	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-16	Rye	Seeds, grouts, flour meal	A,D,E	ORG	3120D-01 - 14
3120P-17	Sorghum	Seeds	A,D,E	ORG	3120D-01 - 14
3120P-18	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3120D-01 - 14
3120P-19	Sunflower	Seeds, oil and cake/expeller, kernel	A,D,E	ORG	3120D-01 - 14
3120P-20	Wheat	Seeds, grouts, flour meal, bran, semolina	A,D,E	ORG	3120D-01 - 14

43 – 3121 EKOTURKA ETHIOPIA

Processors:

Unit No	Name Unit	Process	Address
3121D-02	Selamawit G/Mariam	Trade, import & export	Kirkos Sub City Odaa Tower Office no. 514 Addis Ababa, Ethiopia
3121D-03	GHTY General Trading PLC	Trade, import & export	Arada Sub City MK Building Office No. 509 Addis Ababa, Ethiopia

Production unit:

Unit No	Name Unit	Number of producers, total hectares and crops	Status
3121F-01	Gambella- Ethiopia	15 producers, (b) (4) ha, Sesame	Organic
	Gambella- Ethiopia	13 producers (b) (4) ha, Mung bean	Organic
	Gambella- Ethiopia	10 producers (b) (4) ha, Soybean	Organic
	Gambella- Ethiopia	15 producers (b) (4) ha, Sorghum	Organic
	Gambella- Ethiopia	14 producer (b) (4) ha, Beans	Organic
	Gambella- Ethiopia	2 producer (b) (4) ha, Rice	Organic
	Gambella- Ethiopia	11 producer (b) (4) ha, Maize	Organic
	Gambella-Ethiopia	2 producer (b) (4) ha, peanuts	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
3121P-01	Beans	Beans	Organic	3121D-01
3121P-02	Maize	Grains	Organic	3121D-01

3121P-03	Mung bean	Beans	Organic	3121D-01
3121P-04	Rice	Rice	Organic	3121D-01
3121P-05	Sesame	Seeds	Organic	3121D-01
3121P-06	Sorghum	Grains	Organic	3121D-01
3121P-07	Soybean	Beans	Organic	3121D-01
3121P-08	Peanuts	dry	organic	3121D-01

44-3122 DoCOTTON

Processors:

Unit nr	Unit	Process	Address
3122-D01	DoCotton	Collect, filtering, ginning, pressing, transport	Fabric 300 Hocent Tacikistan.

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
3122.F01	3122F1	(b) (4) ha cotton 103 contractor farmers	organic

Products:

Product nr	Product	Final product	Status	Processing unit
3122-P1	Cotton	Cotton	Organic	
3122-P2	Wheat	Wheat	Organic	

45-3126 EKOTURKA KIRGIZIA

Processors:

Unit nr	Unit	Process	Address
3126D-01	Zirve Teks	Trade, import & export	Jalal Abad-KYRGYZSTAN
3126D-02	EKOTURKA	Trade, import & export storing packing	Adiyaman Turkye

Production unit:

Unit nr	Unit	Total area, crops and farmers	Status
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3126F-01	Zirveteks, Ecoturca	1 Producers, (b) (4) Ha, Cotton	Organic
3126F-01	Zirveteks, Ecoturca	1 Producers (b) (4) Ha, Wheat	Organic
3126F-01	Zirveteks, Ecoturca	1 Producers (b) (4) Ha, Green Mung Beans	Organic
3126F-01	Zirveteks, Ecoturca	1 Producers (b) (4) Ha Maize	Organic

Products:

Product nr	Product	Final product	Status	Processing unit
3126P-01	Cotton	Cotton Ginned	Organic	3126D-01, 02
3126P-02	Wheat	Wheat Seed	Organic	3126D-01, 02
3126 P03	Green Mung Bean	Green Mung Bean Seed	Organic	3126D-01, 02
3126P-04	Maize	Maize Seed	Organic	3126D-01, 02

46– 3127 EKOTURKA KAZAKHSTAN

Agricultural units:

Unit No	Name Unit	Number of producers, total hectares and crops	Status
3127F-01	KH "DEL TV"	1 Üretici, (b) (4) ha Linseed, wheat,	Org
3127F-01	Agrocer	1 Üretici, (b) (4) ha, Linseed, wheat, Sunflower, Barley, Canola,	Org
3127F-01	Aziya Tarangul	1 Üretici, (b) (4) ha, Linseed, wheat, Barley, Oats, Canola, Peas, Buckwheat	Org
3127F-01	ASHAT AGRO	1 Üretici, (b) (4) ha, Linseed, wheat, Barley, Oats, Canola, Buckwheat	Org
3127F-01	AZIYA TARANGUL	1 Üretici, (b) (4) ha, Barley, canola, flax, peas, oats, wheat	Organik

Processors:

Unit nr	Unit	Process	Address
3127D-01	Qrient	Trade, import & export	Almaaty Kazakhstan
3127D-02	EKOTURKA	Trade, import & export storing packing	Adiyaman Turkye

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3127P-01	Barley	Seeds	A	Org	-
3217P-02	Buckwheat	Seeds	A	Org	-
3127P-03	Canola	Seeds	A	Org	-

3127P-04	Linen Seed	Seeds	A	Org	-
3127P-05	Oat	Seeds	A	Org	-
3127P-06	Pea	Seeds	A	Org	-
3217P-07	Sunflower	Seeds	A	Org	-
3127P-08	Wheat	Seeds	A	Org	-

47-3128 EKOTURKA – RUSSIA

Production unit:

Unit No	Name Unit	Number of producers, total hectares and crops			Status
3128F-01	Agrofenovskaya	1 Farmer, (b) (4)	Ha Linseed, Wheat, Maize, Sunflower, Barley, Millet, Chickpea	Org	
3128F-02	Ametist	1 Farmer, (b) (4)	Ha Wheat, Soybean, Maize, Sunflower, Barley, Mustard, Canola, Chickpea	Org	
3128F-03	Krasniy Sad	1 Farmer, (b) (4)	ha Linseed, Wheat, Soybean, Sunflower, Barley, Canola, Pea	Org	
3128F-04	Rostov Mir,	1 Farmer, (b) (4)	ha Wheat, Maize, Sunflower, Barley, Vetch	Org	

Products

Product no	Name product	Last product	Product Category	Status	Process no
3128P-01	Barley	Seeds	A	Org	
3218P-02	Canola	Seeds	A	Org	
3128P-03	Chickpea	Seeds	A	Org	
3128P-04	Linseed	Seeds	A	Org	
3128P-05	Maize	Seeds	A	Org	
3128P-06	Millet	Seeds	A	Org	
3218P-07	Mustard	Seeds	A	Org	
3128P-08	Pea	Seeds	A	Org	
3128P-09	Sojabeans	Seeds	A	Org	
3128P-10	Sunflower	Seeds	A	Org	
3128P-11	Vetch	Seeds	A	Org	
3128P-12	Wheat	Seeds	A	Org	

48-3140 PRODEXIM

Processors:

Unit nr	Unit name	Process	Address
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3140D-01	TOV Prodexim Ltd.	Export, Trade, Transport, Storage, Finance	5, Port-Elevator, Kherson, 73000, Ukraine
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Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
3140F-01	FX Ykos I K – Kherson	(b) (4) ha arable fields, 1 producer	Org
3140F-02	TD Prodexim – Kherson	ha arable fields, 1 producer	Org
3140F-03	FG Svitanok – Kherson	ha arable fields, 1 producer	Org
3140F-04	Imanuil Farm – Kherson	ha arable fields, 1 producer	Org
3140F-05	TOV Pioneer – Kherson	ha arable fields, 1 producer	Org
3140F-06	FH Viktoria-Askania – Kherson	ha arable fields, 1 producer	Org
3140F-07	TOV Kiselevka – Kherson	ha arable fields, 1 producer	Org

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3140P-01	Corn	Seeds	A,D,E	ORG	3140D-01
3140P-02	Peas	Seeds	A,D,E	ORG	3140D-01
3140P-03	Pumpkin	Kernel	A,D,E	ORG	3140D-01
3140P-04	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-05	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-06	Sunflower	Seeds, oil and cake/expeller	A,D,E	ORG	3140D-01
3140P-07	Vegetables	Fresh	A,D	ORG	3140D-01
3140P-08	Wheat	Seeds	A,D,E	ORG	3140D-01

49-3141 EKOLIUM

Processors:

Unit nr	Unit name	Process	Address
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3141D-01	Ekolium, LLC.	Export, trade, administration, finance, organizing farms and processors, transport, storage	9, Boryspilska str, building 21, Kiev, 02099, Ukraine
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Agricultural units:

No	Unit name	Number of producers, hectar and crop	Status
NA			

Products:

Product no	Name product	Last product	Status	Process no
3141P-01	Barley	Seeds, grouts, brans, flakes	A,D,E	3141D-01
3141P-02	Buckwheat	Seeds, grouts, flakes	A,D,E	3141D-01
3141P-03	Corn	Seeds, grouts, flour meal, flakes	A,D,E	3141D-01
3141P-04	Flax	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-05	Lupine	Seed	A,D,E	3141D-01
3141P-06	Millet	Seeds, grouts, flour meal, flakes	A,D,E	3141D-01
3141P-07	Mustard	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-08	Oat	Seeds, grouts, flakes, brans, flour meal	A,D,E	3141D-01
3141P-09	Peas	Seeds, grouts, flakes	A,D,E	3141D-01
3141P-10	Pumpkin	Kernel	A,D,E	3141D-01
3141P-11	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-12	Rye	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01
3141P-13	Sorghum	Seeds	A,D,E	3141D-01
3141P-14	Soybean	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-15	Spelt (wheat)	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01
3141P-16	Sunflower	Seeds, oil and cake/expeller	A,D,E	3141D-01
3141P-17	Walnut	Kernel	A,D,E	3141D-01
3141P-18	Wheat	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	3141D-01

50-3142 SRF ROSE

Processing Units:

Unit nr	Unit	Process	Address

NA			
----	--	--	--

Agricultural Units:

Unit nr	Unit	Total area, crops and farmers	Status
3142F-01	671, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-02	677-2, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-03	678-2, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-04	678-7, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-05	1142-5, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-06	1178-5, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-07	1266-9, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-08	1265-9, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-09	1266-7, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-10	1266-10, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-11	1266-12, Daepyeong-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-12	227-1, Guwon-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-13	230-7, Guwon-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-14	248-1, Guwon-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-15	248-3, Guwon-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-16	249-12, Guwon-ri, Gokseong-eup	(b) (4)	ha Rose Production Org
3142F-17	31-23, Sin-ri, Gokseong-eup	(b) (4)	ha Rose Production Org

Products:

Product nr	Product	Final product	Status	Processing unit
3142P-01	Rose	Leaves	Org	-

51-3149 JMG

Processing Units:

Unit nr	Unit	Process	Address
3149D-01	JANGHUENG MUSANGIM CO.,LTDFactory	Processing of seaweed	1478, Jangheung-daero, Gwansan-eup, Jangheung-gun, Jeollanam-do, Korea

Agricultural Units:

Unit nr	Unit	Total area, crops and farmers	Status
3149F-01	Hanil: 10125, 10198, 10308, 10345, 10346, 10312, 10309, 10341, 10212, 10332, 10253	(b) (4) ha, Seeweed, 4 Farmers	Org
3149F-02	Yongil: 10223, 10194, 10216, 10345, 10310	(b) (4) ha, Seeweed, 3 Farmers	Org

Products:

Product nr	Product	Final product	Status	Processing unit
3149P-001	Organic seaweed	Organic Snack	Org	JANGHUENG MUSANGIM
3149P-002	Organic seaweed	Organic Sea Tangle Snack	Org	JANGHUENG MUSANGIM
3149P-003	Organic seaweed	Roasted Seasoned Seaweed	Org	JANGHUENG MUSANGIM

52- 3170 NT-NOVA LTD

Processing units:

Unit nr	Unit	Process	Address
3170D-01	NT-NOVA LTD	Import-export, trader, finance, investment, documentation, forwarding	11, Domostroitelnaya Street, 2 floor, office 203, Kherson, 73011 Ukraine

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
NA			

Products:

Product nr	Product	Final product	Product category	Status	Processing unit
3170P-01	Barley	Seeds	A	ORG	3170D-01
3170P-02	Buckwheat	Seeds	A	ORG	3170D-01
3170P-03	Chickpea	Seeds	A	ORG	3170D-01
3170P-04	Corn	Seeds	A	ORG	3170D-01
3170P-05	Coriander	Seeds	A	ORG	3170D-01
3170P-06	Flax	Seeds	A	ORG	3170D-01
3170P-07	Lupine	Seeds	A	ORG	3170D-01
3170P-08	Millet	Seeds	A	ORG	3170D-01
3170P-09	Mustard	Seeds, Oil, cake	A,D,E	ORG	3170D-01
3170P-10	Oat	Seeds	A	ORG	3170D-01
3170P-11	Peas	Seeds	A	ORG	3170D-01
3170P-12	Pumpkin	Kernel	A	ORG	3170D-01
3170P-13	Rapeseed	Seeds, Oil, cake	A,D,E	ORG	3170D-01
3170P-14	Rye	Seeds	A	ORG	3170D-01
3170P-15	Sorghum	Seeds	A	ORG	3170D-01
3170P-16	Soybean	Seeds, Oil and Cake	A,D,E	ORG	3170D-01
3170P-17	Sugar beet	Cake/pulp	A,D,E	ORG	3170D-01
3170P-18	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3170D-01
3170P-19	Wheat	Seeds	A	ORG	3170D-01

53-3172 ART SEED Ltd.**Processors:**

Unit no	Unit name	Process	Address
3172D-01	Art Seed Ltd.	Import-export, trader, forwarding, investment, documentation, finance, organizing farms and processors	14, Parovozna str., Kherson, 73000, Ukraine
3172D-02	PrAT "Dneprovskiy terminal"	Storage, Transshipment, Forwarding	169 Perekopskaya str., Kherson, Ukraine
3172D-04	Agro-Transit-Invest LTD	Storage, Transshipment, Forwarding, Drying of goods	11, Domobudivelnna Str., Kherson, Ukraine, 73011

Agricultural units:

Unit No	Unit name	Number of producers, hectar and crop	Status
3172F-01	Triel-Agro - Kherson	(b) (4) ha arable fields, 1 producer	Org
3172F-02	FG Diana - Kherson	(b) (4) ha arable fields, 1 producer	Org

3172F-03	STOV "Bereginya" - Kherson	(b) (4)	ha arable fields, 1 producer	Org
3172F-04	TOV "Preobrazhenske" - Zaporojie	(b) (4)	ha arable fields, 1 producer	Org

Products:

Product no	Name product	Last product	Product Category	Status	Process no
3172P-01	Barley	Seeds, grouts	A,D,E	ORG	3172D-01 - 09
3172P-02	Corn	Seeds, grouts, flour meal	A,D,E	ORG	3172D-01 - 09
3172P-03	Millet	Seeds, grouts, flour meal	A,D,E	ORG	3172D-01 - 09
3172P-04	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	ORG	3172D-01 - 09
3172P-05	Sorghum	Seeds	A,D,E	ORG	3172D-01 - 09
3172P-06	Soybean	Seeds, oil and cake/expeller	A,D,E	ORG	3172D-01 - 09
3172P-07	Sunflower	Seeds, oil and cake/expeller, kernel	A,D,E	ORG	3172D-01 - 09
3172P-08	Wheat	Seeds, grouts, flour meal, bran, semolina	A,D,E	ORG	3172D-01 - 09

54-3180 KAZECOTRADE LTD.

Processing units:

Unit nr	Unit	Process	Address
3180D-01	Kazecotrade ltd.	Import-export, Trader, Documentation, Finance, Investment, Forwarding, Transshipment, Organizing farms and processors, Storage	13, Koktem dist., Of.71, Kokshetau, Akmolinskiy region, Republik Kazakhstan, 02222

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
3180F-01	TOO "Raisovskoe"	(b) (4) ha arable fields, 1 producer	Org
3180F-02	KH "Zhumagulov"	(b) (4) ha arable fields, 1 producer	Org
3180F-03	TOO "Boris-Romanovskoe"	(b) (4) ha arable fields, 1 producer	Org
3180F-04	KH "Asar"	(b) (4) ha arable fields, 1 producer	Org

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3180P-01	Barley	Seeds, grouts	A,D	ORG	3180D-01
3180P-02	Flax	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-03	Oat	Seeds, flour	A,D	ORG	3180D-01
3180P-04	Peas	Seeds, grouts	A,D	ORG	3180D-01

3180P-05	Potato	Fresh	A,D	ORG	3180D-01
3180P-06	Rapessed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-07	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3180D-01
3180P-08	Wheat	Seeds, grouts, flour	A,D	ORG	3180D-01

55-3193 OJSC Vinnytsa Oil-and-Fat-Production Plant

Processing units:

Unit nr	Unit	Process	Address
3193D-01	OJSC Vinnytsa Oil-and-Fat-Production Plant	Import-export, trader, finance, documentation, forwarding, investment, Process of oil and cake	26, Nemyrivske Shosse, Vinnytsa, 21034, Ukraine

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
NA			

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3193P-01	Rapeseed	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01
3193P-02	Soybean	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01
3193P-03	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3193D-01

56-3194 LLC NIKMORSERVICES NIKOLAEV

Processing units:

Unit nr	Unit	Process	Address
3194D-01	LLC "NIKMORSERVICES NIKOLAEV"	Import-Export, Trader, Finance, Documentation, Forwarding, Investment	1/1, Grazhdanskiy spusk, Nikolaev, 54002, Ukraine

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3194P-01	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3194D-01

57-3195 AGRO SUPPLIES LLC.**Processing units:**

Unit nr	Unit	Process	Address
3195D-01	"Agro Supplies" LLC.	Import-Export, Trader, Finance, Documentation, Forwarding, Investment	27, Kaunasskaya str., Kiev, 02160, Ukraine

Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
-			

Products:

Product nr	Product	Final product	Product Category	Status	Processing unit
3195P-01	Sunflower	Seeds, Oil and Cake/expeller	A,D,E	ORG	3195D-01

From: [Mann, Renee - AMS](#)
To: [Crail, Lars - AMS](#)
Subject: RE: ETKO audit
Date: Thursday, January 15, 2015 5:40:00 PM

Thanks!

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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From: Crail, Lars - AMS
Sent: Thursday, January 15, 2015 5:37 PM
To: Mann, Renee - AMS
Subject: RE: ETKO audit
Onsite from the 12 – 16 May

From: Mann, Renee - AMS
Sent: Thursday, January 15, 2015 5:25 PM
To: Crail, Lars - AMS
Subject: ETKO audit

Hi Lars –

Can you please confirm the dates of the ETKO audit? Was it May 12-14?

Thanks,

Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

[Join the NOP mailing list.](#)

From: ma@etko.org
To: [Mann, Renee - AMS](#)
Subject: RE: Registered: Annual Report Acknowledgement
Date: Monday, March 10, 2014 11:36:24 AM

Dear Renee
Thank you for confirmation.
Have a nice day,
Mustafa

From: Renee.Mann@ams.usda.gov [mailto:Renee.Mann@ams.usda.gov]
Sent: Monday, March 10, 2014 4:38 PM
To: ma@etko.org
Subject: Registered: Annual Report Acknowledgement
RPost Registered Email



This is a Registered Email[®] message from **Mann Renee - AMS**.

Dear Dr. Akyuz:
Thank you for the submission of your annual report. The USDA National Organic Program has reviewed your report and found that ETKO has adequately complied with the annual reporting requirement. Please contact me with any questions you may have.

Sincerely,

Renee

Ms. Renee Mann

Accreditation Manager

USDA National Organic Program

(202) 260-8635 (Note new phone number)

[NOP website](#)

Sign up for our newsletter, the [USDA Organic Insider](#).

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[Click here](#) to send a Registered Email[®] message to anyone.

From: [Mann, Renee - AMS](#)
To: [Lusby, MaryLou - AMS](#)
Subject: RE: Review of Annual Report for ETKO
Date: Monday, February 09, 2015 7:59:00 AM
Attachments: [image001.png](#)

Thank you, Mary Lou.

Renee Mann

Assistant Director, Accreditation and International Activities Division

USDA National Organic Program

(202) 260-8635

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From: Lusby, MaryLou - AMS
Sent: Friday, February 06, 2015 2:32 PM
To: Mann, Renee - AMS
Subject: Review of Annual Report for ETKO

Rene,

I have finished reviewing the [Annual Report for ETKO](#). The documentation has been saved in there folder.

Thank you

Mary Lou Croisetiere



Mary Lou Croisetiere | Program Specialist, National Organic Program
USDA AMS | 100 Riverside Parkway Suite 101 Fredericksburg VA 22406 540-361-2712

MaryLou.Lusby@ams.usda.gov

From: ma@etko.org
To: [Zuck_Penelope - AMS](#)
Cc: [Claypool_Rebecca E - AMS](#); [AMS - AIAinbox](#); [AMS - NOPAppeals](#)
Subject: RE: Registered: Notice of Non-compliance - AIA6155PZ
Date: Sunday, July 03, 2016 11:16:43 AM
Attachments: [~WRD389.jpg](#)
[image001.png](#)
[20160704 Corrective Action Letter NC.pdf](#)
[GP 11 Use of Logo, Licences, Mark of Conformity.Rev01.pdf](#)
[GP 13 F 03 NOP Certificate Rev 07.pdf](#)
[GP 18 NOP Certification Procedure.Rev03.pdf](#)
[OP 01 F 33 Assesment Label NOP.pdf](#)

Ms Zuck

You can find attached corrective actions we took. Updates are indicated with blue color.

Sincerely

Mustafa Akyuz

ETKO Turkey
T+90-232-3397606
F+90-232-3397607
www.etko.org

From: Penelope.Zuck@ams.usda.gov [mailto:Penelope.Zuck@ams.usda.gov]
Sent: Tuesday, June 21, 2016 3:51 PM
To: ma@etko.org
Cc: Rebecca.E.Claypool@ams.usda.gov; AIAinbox@ams.usda.gov; NOPAppeals@ams.usda.gov
Subject: Registered: Notice of Non-compliance - AIA6155PZ



This is a Registered Email[®] message from **Zuck Penelope - AMS**.

Dear Dr. Akyuz,

Please see the attached Notice of Noncompliance to the USDA organic regulations. Corrective actions are due within 30 days of receipt of this notice. If you have questions on this notice, please do not hesitate to contact me.

Best regards,
Penny



PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250
☎ 202.260.9444 | Fax 202.205.7808 | ✉ Penelope.Zuck@ams.usda.gov
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Ref No: 2016070401
Subject: NONC AIA6155PZ.NC1

Date: July 04, 2016

Ms Zuck

To avoid reoccurrence of violation of the certification requirements of NOP we updated following procedures and the certificate.

You can find attached;

- 1-Corrected NOP certificate template
- 2-GP 18 NOP Certification Procedure Point 7.5.2
- 3-GP 11 Use of Logo and Liceses; point 5.2 Labelling requirements According to NOP.
- 4-OP 01 F 33 Assessment Lable NOP Point Subpart D

Sincerely.

Dr. Mustafa AKYÜZ
Gn Md.

ETKO
EKOLOJİK TARIM KONTROL ORG.LTD.ŞTİ.
160 Sk.No:13/7 35040-Bornova
Tel:0232.339 76 06 Fax:339 76 07
Bornova M.D. 381 023 6931 İZMİR

(b) (6)

Tel: 0232-3397606

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Email: info@etko.org

http: www.etko.org

Tax office: Bornova
Tax No: 381 023 6931

Chamber of commerce
No: 92592.1

Bank
Türkiye İşbankası
Bornova Şubesi

Account
Euro:
T.lira:

(b) (4)

	LABELING USE OF LOGO, LICENCES, CONFORMITY MARKS	DOC. NR	GP 11
		DATE	04.07.2016
		REV. NR	01
		PAGE	1/9

1. PURPOSE

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

2. RESPONSIBILITIES

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

3. RECORDS

4. REFERENCES

GP 18 NOP Certification Procedures
GP 23 Private Standards Certification

5. APPLICATION

5.1. Use of the ETKO Logo

ETKO has established its own logo.

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

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

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

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

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

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

In the following cases ETKO logo cannot be used:

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

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

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

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

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

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

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

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

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

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

5.2 Labeling Requirements

Clients must meet the following criteria:

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

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

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

According to NOP:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.5. Misuse of logo and marks, false claims

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

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

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

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

5.6. USDA seal

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

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

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

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

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

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

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

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

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

The processed food can be labeled according to this Standard;

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

IACB;

The list of ingredients shall indicate which ingredients are organic.

Compulsory indications:

Code nr of control body

Community logo

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

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

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

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

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

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

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

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

Organic production logos:

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

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

5.9 Private Standard Certification Schemes Logo Use

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

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CERTIFICATE

Certificate of Organic Operation

No: **XXXX.XX.XXXX.NOP**

Issued to
XXXXXX

ETKO has performed an inspection, as mentioned in articles of the “**NOP regulation Final Rule 7 CFR Part 205**”, on organic production of agricultural products and indications referring there to on agricultural products and foodstuffs, assigned by the following company. This certificate refers only the organic origin and the equivalence to the NOP Final Rule.

Any reference to the organic production made has to respect the requirements as determined in Subpart D of the rule. Any other rules of labeling as determined by national food acts have to be followed.

Scopes:
HANDLING/PROCESSING, CROPS, WILD CROPS

Product Category:

100% Organic (&205.301 a); Organic (&205.301 b); Made with Organic (&205.301 c);

Product no	Name product	Product Category


This certificate is valid for the above mentioned products. Certification renewal must be done annually before the anniversary date. Once certified, a production or handling operation's organic certification continues in effect until [surrendered, suspended or revoked](#).

Based on the annual inspections, which ETKO performs, this certificate is updated and kept into force.

The certificate must be returned to ETKO on the day of cancellation of the certification contract or on suspension or revocation of the certification

Place and date of issue
Effective date of certification
Next renewal date
Last Inspection date

Izmir, TURKEY, **XX.XX.2015**
XX.XX.XXXX
XX.XX.XXXX
XX.XX.XXXX

	On Behalf of ETKO :	ETKO 160 Sok 13/3 35100 Bornova IZMIR – TURKEY T: +902323397606, F: +902323397607 Email: info@etko.org , www.etko.org
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The authenticity and validity of this document can be verified on www.etko.org



ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd Şti.

ISO 17065
INSPECTION & CERTIFICATION PROCEDURE FOR ORGANIC
PRODUCTS

Prepared by
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1. Introduction

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

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

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

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

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

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2. Approval and Quality Management:

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

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

3. Distribution List

Controlled copies of this QM are distributed to

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

The original of Quality Manuel is kept by QM.

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


4. Purpose

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

5. Responsibilities

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

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6. Records and Reference Procedure:

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

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

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

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


7. Certification Requirements

7.1. General

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

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

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

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

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

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

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

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

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

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7.2. Application

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

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

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

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

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


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

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

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

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

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7.2.1. Contract

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

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

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

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

7.2.2. Application Package

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

7.2.2.1 Content of Application Package

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

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

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

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

7.2.2.2 Farming operations:

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

7.2.2.3 Processing and Handling Facilities:

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

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

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

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

7.3 Application Package Review

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

Application review consists following:

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

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

Within a reasonable time, ETKO


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

Notes:

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

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

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7.3.1 Organization of APPLICANT for Inspection

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

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

7.3.2 Ongoing Audit Monitoring of Records:

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

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

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

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

The client shall keep records according to the following procedure:

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

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

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

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

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

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


7.3.3 Time of the Essence

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

7.3.4. Functions

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

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

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

7.4. Evaluation

7.4.1 Aim of the Evaluation

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

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

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

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

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

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

7.4.2. On Site Inspection

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

1. Technical instructions;
2. Related OPs and GPs

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

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

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

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

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

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

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

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

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

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

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

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

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


7.4.3. Laboratory Testing

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

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

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

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7.4.4. Production Inputs and Commodity Tracking System

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

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

The inspector must be sure that:

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

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

7.4.5. Audit Report

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

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

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


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

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

7.4.6. Surveillance

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

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

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

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

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

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

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


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

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

7.4.7. Records:

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

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

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

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

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

7.4.8. Continuing Support

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

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

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

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

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

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

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

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

7.4.9. Ongoing Compliance

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

- **Production input records**

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

- **Commodity-tracking systems**

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

- **Audits of record keeping systems**

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


- **Regular reporting of specific information**

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

7.4.10. Temporary variances

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

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

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

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

7.4.11. Acceptable and Prohibited Materials

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

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


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

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

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

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

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7.4.12. Transition Period

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

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

Measurement of the minimum period is determined as follows:

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

7.4.13. Packaging and Post-Harvest Handling

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

7.4.14. Processing

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

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

7.4.15. Setting the Fee

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

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

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

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

7.4.16 Propagation Material Non-commercially Available

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

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

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

7.4.17 Ingredients Non-commercially Available

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

7.5. Granting Certification

7.5.1. Certification Decision

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

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

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

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

ETKO Organic Certifier grants certification based on the determination that:

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

7.5.2. Certification Certificate

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

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

The certificate of organic operation specifies the:

- (1) Name and address of the certified operation; including a physical address if the mailing or legal address is not the physical location of the operation
- (2) Name, address, and telephone number of ETKO
- (3) Effective date of certification; (when ETKO or initial certifying agent first certified the operation to the USDA organic regulations)
- (4) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation;
- (5) Issue date (when ETKO issued the organic certificate);
- (6) Anniversary date (when the certified operation must submit its annual update).
Organic certificates cannot include expiration dates;
- (7) Categories of organic operation (crops, wild crops, livestock, and handling / processing)

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

A list of all issued certificates shall be maintained, containing the following information:

- Certificate number
- Client/company name
- Address-country
- Applicable standards, regulations
- Scope of certification
- Accreditation status
- Certification date
- Validity date
- Status of certification (suspended, withdrawn...)

7.5.3. Denial of Certification

ETKO provides a Notification of Noncompliance (NONC) (GP 18 F10) to the applicant when ETKO has reason to believe that the applicant for certification is not able to comply or is not in compliance with the requirements

- during the application review, based on a review of the information submitted by the applicant (as specified in NOP rule §205.402) or
- during the initial inspection (as specified in NOP rule §205.404)

When correction of a noncompliance is not possible, a Notification of Noncompliance and a Notification of Denial of Certification may be combined in one notification. The Notification of Noncompliance (NONC) (GP 18 F 10) provides:

1. A description of each noncompliance;
2. The facts upon which the Notification of Noncompliance (NONC) GP 18 F 10 is based; and
3. The date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

Upon receipt of such notification of noncompliance, the applicant may:

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

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2. Correct noncompliance and submit a new application to another certifying agent. (NOTE: If such an applicant applies to ETKO for certification, the applicant must include a complete application, the notification of noncompliance received from the first certifying agent, and a description of the corrective actions taken with supporting documentation) or
3. Submit written information to ETKO to rebut the noncompliance described in the notification of noncompliance.

After issuance of a Notification of Noncompliance (GP 18 F 10), ETKO:

1. Evaluates the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and
 - When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issues the NOP Certificate (GP 13 F 03) to the applicant pursuant to §205.404; or
 - When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issues the applicant a Notification of Denial of Certification (NODC) “GP 18 F 12A or GP 18 F 12B”
2. If applicant fails to respond to the Notification of Noncompliance (GP 18 F10), issues a Notification of Denial of Certification.(NODC) (GP 18 F 12 A in application review phase, GP 18 F 12 B in initial inspection phase)


Copies of NONC, NODC, NONCR are submitted to the Administrator, pursuant to §205.501(a)(15).

The Notification of Denial of Certification (NODC) (GP 18 F 12 A&B) states the reason(s) for denial and the applicant's right to:

- Reapply for certification
- Request mediation to Administrator or, if applicable, pursuant to a State organic program; or
- File an appeal of the denial of certification pursuant to §205.681 or, if applicable, pursuant to a State organic program.

The applicant for certification who has received the NONC (GP 18 F 10) or the Notification of Denial of Certification NODC (GP 18 F 12 A or B) may apply for certification again at any time to any certifying agent, in accordance with §§205.401 and 205.405(e).

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When such applicant submits an application to ETKO instead of the certifying agent who issued the notification of noncompliance or notice of denial of certification, the applicant for certification must include a copy of the Notification of Noncompliance “NONC” or Notice of Denial of Certification “NODC” and a description of the actions taken, with supporting documentation, to correct the noncompliance noted in the notification of noncompliance.

When ETKO receives a new application for certification, which includes a notification of noncompliance or a notice of denial of certification issued by another CB, the application is treated as a new application and a new application process is started pursuant to §205.402.

- **False statements or mis-presentations**

If ETKO has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented its operation or its compliance with the certification requirements, the certification may be denied certification without first issuing a Notification of Noncompliance (GP 18 F10)


7.5.4. Continuation of Certification.

Each year, before the date indicated by ETKO, the producer must notify ETKO of its schedule of production of crop products, giving a breakdown by parcel. This schedule can be shown on the organic compliance plan. Plan needs to be revised each year by the operator and review will be made by a competent staff of ETKO. The operators that do not annually submit the information required as follows will be issued Notification of Non compliance.

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

1. An updated organic production or handling system plan which includes:
 - a. A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year; and
 - b. Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, related to production practices
2. Any additions to or deletions from the information related to address, responsible person, name of the company, telephone number given to ETKO for certification.
3. An update on the correction of minor noncompliance previously identified by ETKO as requiring correction for continued certification; and

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4. Other information as deemed necessary by ETKO to determine compliance with the Act and the regulations in this part.

Following the receipt of the a/m information, ETKO, within a reasonable time arranges and conducts an on-site inspection of the certified operation as per OP 01 (pursuant to §205.403) Note: When it is impossible to conduct the annual on-site inspection following receipt of the client's annual update of information, ETKO may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months: *Provided*, That, the annual on-site inspection is conducted within the first 6 months following the client's scheduled date of annual update.

If ETKO has reason to believe, based on the on-site inspection and a review of the information specified by client, that the client is not complying with the requirements of the Act and the regulations in this part, then ETKO Organic Certifier provides the Notification of Noncompliance (GP 18 F 10) to the operation in accordance.

In case ETKO determines that the client is complying with the Act and the regulations and that any of the information specified on the certificate of organic operation has changed, then, an updated certificate of organic operation is provided.

In case annual update is not provided before the annual inspection a written notification of noncompliance (GP 18 F 10) is provided to client by the OC.

7.5.6. Conditional Certification

When a product is qualified as being organic, but deficiencies in its producing operation remains, conditional certification may yet be granted. The applicant is notified of the non compliances determined by ETKO, which are necessary to be remedied within a specified timeframe. Upon the applicant's corrective action plans for the non compliances, certification can be conditionally granted – with a concurrent verification of actions taken for compliance.

- **Exempt handlers**

Operations that are exempt from certification and submission of an organic system plan are subject to the following requirements:

- Any production or handling operation with gross agricultural income from organic sales that total less than \$5,000.00 annually.

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- A handling operation that is a retail food establishment or portion of retail food establishment that handles but does not process organically produced agricultural products.
- A handling operation or portion of handling operation that handles agricultural products that contain less than 70 percent organic ingredients (by total weight of the finished product, excluding water and salt).
- A handling operation or portion of handling operation that only identifies organic ingredients on the information panel.

Exempt handlers who only handle products containing less than 70 percent organic ingredients or only list organic ingredients on the information panel must comply with the following:

- Provisions for the prevention of organic products commingled with non-organic and prevention of contact with prohibited substances;
- Labeling provisions; and
- Recordkeeping provisions in §205.101 (c)

Products from an exempt production operation cannot be used as ingredients identified as organic in processed products produced by a certified handling operation

The following operations are excluded from the NOP regulatory requirements


- A handling operation or portion of a handling operation and the operation or portion of the operation only sells organic agricultural products labeled as “organic” provided such products are packaged or otherwise enclosed in a container prior to being received or acquired by the operation; and remain in the same package or container and are not otherwise processed while in the control of the handling operation.
- A retail food establishment or portion of a retail food establishment that processes, on the premises of the retail food establishment, raw and ready-to-eat food from agricultural products that were previously labeled as “organic.”

Excluded handling operations shall comply with the requirements to prevent commingling and contact with prohibited substances and the requirements for labeling in §205.310

Exempt handling operations, as identified by §205.101(a) (3-4), shall maintain for 3 years records sufficient to:

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

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

7.5.7. Compliance and Handling of Noncompliance

ETKO will handle noncompliance's according to:

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

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

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

7.5.8. Review and Investigations


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

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

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

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

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7.5.9. Noncompliance

ETKO provides the Notification of Noncompliance (NONC) (GP 18 F 10) to the applicant/certified operation in cases where and when:

- ETKO has reason to believe that, based on the information specified in application package DURING APPLICATION PACKAGE REVIEW, the applicant for certification is not able to comply or is not in compliance with the requirements of NOP rule. and
- ETKO has reason to believe that, BASED ON THE ON-SITE INSPECTION and the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant, the organic system plan and all procedures and activities of the applicant's operation, a certified operation is not complying with the requirements of NOP.

All the observations made during initial inspection, surveillance and special inspections are recorded on the Inspection Report Section Evaluation Results

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

The Organic Certifier provides the Notification of Noncompliance (GP 18 F 10) to the client, upon the evaluation of the application file or inspection reports and all other related documents and information obtained during inspection.

While grading non-conformances the following conditions shall be considered:

- One of the requirements of standard or regulation related to the process or product are not complied
- Production process plan not applied
- Product is under risk

Non-conformances are graded as major and minor.

- **Major non-conformances**
 - o Factors affecting the organic integrity of the product or land.
 - o Factors causing risk on the product.
 - o Use of inputs which are not allowed by the regulations.
 - o Non-Organic product sales as organic.
 - o Requirements of regulation or standard not applied

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- o Frequent minor non-conformances on the same requirement of regulation.
- o Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.
- o Misuse of the licenses and certificates
- o Production process plan not implemented.
- o Annual updates not provided
- o Several minor interrelated noncompliance can lead to a major noncompliance.

- **Minor non-conformances**

- o Failure to fully satisfy a requirement of a standard or regulation.
- o Factors causing no risk on the condition of the product.

Notification of noncompliance (GP 18 F 10) clearly indicates

- A description of the noncompliance,
- The facts upon which the notification of noncompliance is based; and
- The date by which the applicant/certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

By a Notification of Noncompliance (GP 18 F 10), ETKO requires the certified operation to determine corrective action plan(s) related to the major and minor non-compliances defined in the Notification of Noncompliance.

- To be recommended for certification all major non-conformances must be closed and corrective action plans for minor non-conformances must be determined by the client
- Non-conformances graded as **Major** in Notification of Noncompliance: corrective actions must be taken in maximum 30 days. To close out the major non-conformances a follow up inspection may be decided by ETKO.
- Non-conformances graded as **Minor** in Notification of Noncompliance: action plans within 30 must be provided to ETKO by the client.

Corrective action plans and or any other evidence indicating the actions taken are submitted to ETKO to be reviewed by Organic Certifier.

7.5.9.1. Resolving the Non-Compliances

Upon receipt of Notification of Noncompliance, the client may:

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1. Correct the non-compliances and submit a description of the corrective actions taken with supporting documentation to ETKO;
2. Submit written information to ETKO to rebut the noncompliance, described in the Notification of Noncompliance (GP 18 F 10)

After sending a Notification of Noncompliance (GP 18 F 10), ETKO evaluates the client's corrective actions and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary.

7.5.9.1.1. Resolution of Noncompliance: When a client demonstrates that each noncompliance has been resolved, the OC sends to client a Notification of Noncompliance Resolution (GP 18 F 11)

7.5.9.1.2. Proposed suspension or revocation: When rebuttal is unsuccessful or correction of the noncompliance is not completed within 30 days, ETKO will send the certified operation a written notification of proposed suspension (GP 18 F 13) or revocation (GP 18 F 15) of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

After receipt of the Notification of Proposed Suspension or Revocation the certified operator may:

1. File an appeal to this Proposed Suspension or Revocation in 30 calendar days of the receipt of the notice. The appeal must be in writing and submitted to ETKO Managing Director and to the Administrator.
2. Request mediation within 30 days of this notice, in writing to ETKO. If the request for mediation is accepted and the mediation is unsuccessful, upon written notification, the certified operator then will have 30 calendar days, from receipt of notice, to appeal the Proposed Suspension or Revocation. If the request for mediation is rejected, a written notification is sent to the operator and in 30 days from the date of the notice, the operator may appeal the Proposed Suspension or Revocation.

When correction of a noncompliance is not possible, the Notification of Noncompliance and the Proposed Suspension or Revocation of certification may be combined in one notification. The Notification of Proposed Suspension or Revocation of certification states:

1. The reasons for the proposed suspension or revocation;
2. The proposed effective date of such suspension or revocation;
3. The impact of a suspension or revocation on future eligibility for certification; and
4. The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.

7.5.9.1.3. Suspension or revocation:

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(1) If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, ETKO will send the certified operation a written notification of suspension (GP 18 F 14) or revocation (GP 18 F 16)

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

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

7.5.10. Willful violations

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

7.5.11. Violations of Act.

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


1. knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in §3.91(b)(1) of this title” per violation.
2. makes a false statement under the Act to the Secretary, a State organic program's governing State official, or a certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

7.5.12. Eligibility.

1-A certified operation whose certification has been suspended, may at any time, unless otherwise stated in the Notification of Suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Act and the regulations.

2-A certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years

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following the date of such revocation, *Except*, That, the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

7.5.13. Reinstatement of the Suspended Certificate

7.5.13.1 Requirements for Suspended organic producers or handlers


In order to achieve reinstatement, organic producers and handlers who have had their organic certification suspended must:

1. Correct all noncompliances to the USDA organic regulations. This includes not only the reasons stated in the notice of suspension issued by ETKO, but any outstanding noncompliance's that have been subsequently identified ETKO.
2. Ensure that their organic systems plan (OSP) is complete, that the OSP is in compliance with the USDA organic regulations, and that the OSP is being implemented.
3. Contact ETKO and submit all documents required by ETKO for reinstatement. If the suspension has been issued by a CB other than ETKO, the producer or handler must inform ETKO of their suspended status and the reasons for the suspension.
4. Pay all fees required by ETKO
5. Successfully complete a full onsite inspection. The inspection should be conducted pursuant to § 403 (a)(1) and this procedure.
6. Prepare a letter (GP 18 F 17 Reinstatement Request Letter from Suspended Operation to USDA) addressed to the Secretary of Agriculture, care of the NOP, requesting reinstatement of certification. The operator sends the letter to:

USDA, AMS, National Organic Program
 1400 Independence Avenue, SW
 Room 2648, STOP 0268
 Washington, DC 20250
 Or, AIAInBox@ams.usda.gov

Shipping services that require a telephone number may use (202) 720-3252. As an alternative, producers or handlers who have had their organic certification suspended may submit the letter addressed to the Secretary, care of the NOP, through ETKO. ETKO forwards the request to the NOP, along with the required reinstatement documents described in section 5.26.2

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7. Retain all documents related to the request for reinstatement for future audit by the certifying agent and the NOP.


7.5.13.2 Requirements for ETKO

It is ETKO's responsibility to officially inform the suspended producer or handler about the requirements stated in 5.26.1. ETKO communicates with the suspended producer or handler and send an official letter providing the operator with all the information required by the operator to apply to USDA for reinstatement.

Upon receipt of the operation's request for reinstatement or notification that such a request has been sent to NOP, ETKO:

1. Conducts a compliance review of the OSP to ensure that all provisions of the USDA organic regulations are met.
2. Notify the producer or handler who has had their organic certification suspended of any noncompliances according to procedures described in the USDA organic regulations, §205.662(a) and in this procedure by sending NONC letter.
3. Schedules a full onsite inspection to verify the operation's compliance with the USDA organic regulations, provided that the OSP is considered to be complete and in compliance with the USDA organic regulations. On site inspections is done within a three month period prior to the NOP receiving the reinstatement request. Deviations from this procedure must be justified and approved by the NOP.
4. Prepare a signed letter (GP 18 F 18 ETKO Reinstatement Request Letter for Suspended Operation to USDA) to the Secretary, care of the NOP, stating that the operation requesting reinstatement has met all requirements of the USDA organic regulations. The letter affirmatively states that:
 - a. ETKO has conducted an NOP compliance review of the client's OSP.
 - b. The review found that the client's OSP adequately addressed the noncompliance(s) which led to the suspension and is in compliance with the USDA organic regulations.
 - c. ETKO has conducted an onsite inspection of operation and found the operation to be in full compliance and capable of remaining in compliance with the USDA organic regulations, or, noncompliance were issued to the operation as a result of the onsite inspection findings and the operation has submitted corrective

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measures that are approved and determined by the certifying agent to demonstrate compliance with the USDA organic regulations.


5. Submits the letter (along with the operation’s request for reinstatement, if appropriate), as well as the initial Notice of Noncompliance, Notice of Proposed Suspension, Notice of Suspension, and a copy of the inspection report that found the operation in full compliance. If the inspection report includes findings that may be noncompliant, then ETKO’s request for reinstatement includes documented objective evidence to demonstrate the operation’s full compliance with the USDA organic regulations.
6. Retains all documents related to the request for reinstatement for future audit by the NOP.

7.5.13.3. National Organic Program

Upon receipt of the required documentation, the NOP Accreditation and International Activities Division completes the following steps within 30 days of receipt of the request for reinstatement:

1. Review the request for reinstatement along with the supporting documentation. Contact the certifying agent if questions remain regarding the request.
2. Approve the request if:
 - All required documents have been submitted,
 - The documentation clearly demonstrates that the operation is in compliance with the USDA organic regulations and is capable of remaining in compliance, and;
 - The review of documents related to the operation does not indicate that the client has an ongoing history of noncompliance which would indicate an inability or unwillingness to remain in compliance.
3. If the request is approved, the NOP removes the operation from the public list of suspended operations. The NOP issues a letter to the operation, with a copy to ETKO , stating that:
 - a. The operation is eligible for reinstatement by the certifying agent referenced in the request, and
 - b. ETKO retains all documents related to the reinstatement for future audit by the NOP.
 - c.
4. If the request is denied, issues a letter to the operation, with a copy to ETKO, stating the reasons for denying reinstatement.

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5. Review all documentation related to the reinstatement at ETKO's next onsite audit.

7.5.14. Adverse Action Appeal Process

Appeals to be implemented according to the procedure "NOP 4011 Agricultural Marketing Service Office of the Administrator Adverse Action Appeal Process for the National Organic Program" which

- 1) explains the adverse action appeal process;
- 2) clarifies the roles and responsibilities of those involved in the adverse action appeal process; and
- 3) describes possible appeal outcomes

To proceed for an appeal:

7.5.14.1. Objections, Complaints and Legal Cases

Licensee is requested to prepare a file to handle the objections, complaints, and legal cases from its own clients.


This file includes:

- The nature of the received objections, complaints, and legal cases
- The identity of the involved persons/groups
- The causes of the problem
- The action taken
- verification and documentation of the effectiveness of the initiated measures

A specific file is maintained for handling of objections, complaints, and legal cases which at least includes followings:

- Records of the received objections, complaints, and legal cases
- Names of the involved persons/groups
- Records of the subsequently action chosen
- Verification and documentation of the effectiveness of the measures taken

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An applicant may appeal ETKO’s Notification of Denial of Certification (NODC), and a certified operation may appeal ETKO’s Notification of Proposed Suspension (NOPS) or revocation of certification (NOPR), to the AMS Administrator.

Exception: When the applicant or ETKO is subject to an approved State organic program, the appeal must be made to the State organic program which will carry out the appeal pursuant to the State organic program’s appeal procedures approved by the Secretary.

If the Administrator or State organic program sustains a certification applicant’s or certified operation’s appeal of ETKO’s decision, the applicant will be issued organic certification, or a certified operation will continue its certification, as applicable to the operation. The act of sustaining the appeal shall not be an adverse action subject to appeal by ETKO.

If the AMS Administrator or State organic program denies an appeal, a formal administrative proceeding will be initiated to deny, suspend, or revoke the certification. Such proceeding shall be conducted pursuant to the U.S. Department of Agriculture’s Uniform Rules of Practice or the State organic program’s rules of procedure.

7.5.14.2. Filing

An appeal of a noncompliance decision is filed within the time period provided in the letter of notification or within 30 days from receipt of the notification, whichever occurs later. The appeal will be considered "filed" on the date received by the AMS Administrator or by the State organic program. A decision to deny, suspends, or revoke certification or accreditation will become final and no appealable unless the decision is appealed in a timely manner.

Appeals to the AMS Administrator is filed in writing and addressed to Administrator, USDA-AMS, Room 2095-S, and 1400 Independence Ave, SW, Washington, DC 20250.

Appeals to the State organic program are filed in writing to the address and person identified in the letter of notification.


All appeals shall include a copy of the adverse decision and a statement of the appellant’s reasons for believing that the decision was not proper or made in accordance with applicable program regulations, policies, or procedures.

7.5.15. Mediation.

Any dispute with respect to denial of certification or proposed suspension or revocation of certification may be mediated at the request of the applicant for certification or client.

Mediation shall be requested in writing to ETKO.

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If ETKO rejects the request for mediation, a written notification is provided to the applicant for certification or client. The written notification shall advise the applicant for certification or client of the right to request an appeal within 30 days of the date of the written notification of rejection of the request for mediation.

If mediation is accepted by ETKO, a qualified mediator mutually agreed upon by the parties to the mediation shall conduct such mediation. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session. If mediation is unsuccessful, the applicant for certification or client shall have 30 days from termination of mediation to appeal the ETKO's decision.

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

7.5.16. Use Of Logo, Licenses, Mark Of Conformity

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

7.5.17. Criteria for Certification File Review

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DEFECTS	DEFECT CODE	DECISION
GROUP A- CERTIFICATION RECOMMENDATION		
Company/Client name is clearly recorded	A2	NO GO
The licensee number is recorded	A3	NO GO
The address of client/site is recorded	A4	NO GO
Type of certification is specified	A5	NO GO
The related standards and regulations are clearly specified	A6	NO GO
The scope is clearly recorded	A7	NO GO
GROUP B		
The info provided about identity and regulations are correct	B2	NO GO
Inspection dates	B3	PREPARE
Inspection type is specified	B4	NG
Scope is specified clearly	B5	NG
Inspected sites are specified	B6	NG
Findings and observations	B8	NG
GROUP BB		
The info related to the client matches	BB1	NG
Approval of HI	BB2	NG
Signature of the inspector.	BB3	NG
Stamp applied	BB4	NG
GROUP C – INSP. REPORT		
Ensure information duly recorded	C1	NG
Ensure info for change of scope is provided for agricultural units, processes, product as appropriate	C2	NG
Info about field and yield	C3	NG
Info about marketing results	C4	P
Sampling info	C5	P
Ensure inspection findings are summarized with inspection report	C6	NG
Ensure applicable forms are checked and used	C8	NG

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

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

APPLICANT SECTION

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

SUBPART D Labels, Labeling, and Market Information


§205.301 Product composition.

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

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


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

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


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Applicant Section & ETKO Verification

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

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number of the certifying agent may be included in such label.		
(c) Agricultural products in packages described in §205.301(c) must not display the USDA seal.		
§205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) An agricultural product with less than 70 percent organically produced ingredients may only identify the organic content of the product by:		
(1) Identifying each organically produced ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced, and		
(2) If the organically produced ingredients are identified in the ingredient statement, displaying the product's percentage of organic contents on the information panel.		
(b) Agricultural products with less than 70 percent organically produced ingredients must not display:		
(1) The USDA seal; and		
(2) Any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients.		
§205.306 Labeling of livestock feed.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Livestock feed products described in §205.301(e)(1) and (e)(2) may display on any package panel the following terms:		
(1) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feed product;		
(2) The USDA seal;		
(3) The seal, logo, or other identifying mark of the certifying agent which certified the production or handling operation producing the raw or processed organic ingredients used in the finished product, Provided, That, such seals or marks are not displayed more prominently than the USDA seal;		
(4) The word, "organic," or an asterisk or other reference mark which is defined on the package to identify ingredients that are organically produced. Water or salt included as ingredients cannot be identified as organic.		
(b) Livestock feed products described in §205.301(e)(1) and (e)(2) must:		
(1) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by * * *," or similar phrase, display the name of the certifying agent that certified the handler of the finished product. The business address, Internet address, or telephone number of the certifying agent may be included in such label.		
(2) Comply with other Federal agency or State feed labeling requirements as applicable.		
§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:		
(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;		
(2) Identification of the product as organic;		
(3) Special handling instructions needed to maintain the organic integrity of the product;		
(4) The USDA seal;		
(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.		
(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.		
(c) Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.		
§205.308 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as "100 percent organic" or	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

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"organic."		
(a) Agricultural products in other than packaged form may use the term, "100 percent organic" or "organic," as applicable, to modify the name of the product in retail display, labeling, and display containers: Provided, That, the term, "organic," is used to identify the organic ingredients listed in the ingredient statement.		
(b) If the product is prepared in a certified facility, the retail display, labeling, and display containers may use:		
(1) The USDA seal; and		
(2) The seal, logo, or other identifying mark of the certifying agent that certified the production or handling operation producing the finished product and any other certifying agent which certified operations producing raw organic product or organic ingredients used in the finished product: Provided, That, such seals or marks are not individually displayed more prominently than the USDA seal.		
§205.309 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as "made with organic (specified ingredients or food group(s))."	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Agricultural products in other than packaged form containing between 70 and 95 percent organically produced ingredients may use the phrase, "made with organic (specified ingredients or food group(s))," to modify the name of the product in retail display, labeling, and display containers.		
(1) Such statement must not list more than three organic ingredients or food groups, and		
(2) In any such display of the product's ingredient statement, the organic ingredients are identified as "organic."		
(b) If prepared in a certified facility, such agricultural products labeled as "made with organic (specified ingredients or food group(s))" in retail displays, display containers, and market information may display the certifying agent's seal, logo, or other identifying mark.		
§205.310 Agricultural products produced on an exempt or excluded operation.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) An agricultural product organically produced or handled on an exempt or excluded operation must not:		
(1) Display the USDA seal or any certifying agent's seal or other identifying mark which represents the exempt or excluded operation as a certified organic operation, or		
(2) Be represented as a certified organic product or certified organic ingredient to any buyer.		
(b) An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient in a multi-ingredient product produced by the exempt or excluded operation. Such product or ingredient must not be identified or represented as "organic" in a product processed by others.		
(c) Such product is subject to requirements specified in paragraph (a) of §205.300, and paragraphs (f)(1) through (f)(7) of §205.301.		
§205.311 USDA Seal.	YES <input type="checkbox"/> NA <input type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) The USDA seal described in paragraphs (b) and (c) of this section may be used only for raw or processed agricultural products described in paragraphs (a), (b), (e)(1), and (e)(2) of §205.301.		
(b) The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously:		
(1) On a white background with a brown outer circle and with the term, "USDA," in green overlaying a white upper semicircle and with the term, "organic," in white overlaying the green lower half circle; or		
(2) On a white or transparent background with black outer circle and black "USDA" on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.		
(3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.		

ETKO APPROVAL (This section is ETKO use only)

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

unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

[Click here](#) to send a Registered Email® message to anyone.



From: ma@etko.org
To: AIAInbox@usda.gov
Cc: ["ETKO certification"](#)
Subject: ETKO ACA LIST
Date: Monday, January 05, 2015 8:34:30 AM
Attachments: [ETKO ACA 2014.xls](#)

Dear Renee

Here attached you can find ETKO ACA List for 2014 season.

Sorry for being late,

Kind regards and by this way we wish you a prosperous new year from ETKO.

Mustafa Akyuz

NOP 2024-2, 2014 Lists of Certified Operations - Located outside the U.S.

All information must be submitted in Excel format and in English. PDF submissions will not be accepted.

Please provide the following information for all certified organic operations by close of business on January 2, 2015. Begin data entry on row 7 and use the format specified. Thank you.

Scope

Certifying Agent	Certification #	Status	Crops	Livestock	Handling	Wild Crops	Grower Group	Grower Group Size	Last Name	First Name	Operation's Name
Etiko - Ecological Farming Controlling Organization	2009	Certified	No	No	Yes	No	Yes	231	Hamza	Talia	Arisu Gida Dis Tic. A.s.
Etiko - Ecological Farming Controlling Organization	2014	Certified	Yes	No	Yes	Yes	Yes	15	Hermse	Jan	Mezo Ekolojik Urunler
Etiko - Ecological Farming Controlling Organization	2044	Certified	Yes	No	No	No	No		Gurdal	Arif	Arif Gurdal Tarim Isletmesi
Etiko - Ecological Farming Controlling Organization	2058	Certified	No	No	Yes	No	No		Gok	Vuslat	Anadolu Etap Tarim Ve Gida Urunleri Amb San Tic As
Etiko - Ecological Farming Controlling Organization	2070	Certified	Yes	No	Yes	No	No		Iscan	Nuri	Ozpa Gida Tarim Hayvancilik Insaat San. Ve Tic. A.S.
Etiko - Ecological Farming Controlling Organization	2120	Certified	Yes	No	Yes	No	Yes	360	Kus	Sedat	Treko Tarim Gida Ic Ve Dis Tic Ltd Sti
Etiko - Ecological Farming Controlling Organization	2158	Certified	Yes	No	Yes	Yes	No		Hur	Tuqce	Susitas Su Urunleri Ve Sanayi Mamulleri Ithracat Tic As
Etiko - Ecological Farming Controlling Organization	2190	Certified	No	No	Yes	No	No		Gultekin	Ebru	Asya Meyve Suyu Ve Gida San A.s.
Etiko - Ecological Farming Controlling Organization	2203	Certified	Yes	No	Yes	No	Yes	129	Kalkan	Ender	Kalkan Sebze Meyve Hay. Nak. Tur. Ltd. Sti.
Etiko - Ecological Farming Controlling Organization	2314	Certified	Yes	No	Yes	No	No		Goztepe	Sebahattin	Fine Food Gida San Ve Tic Ihr. Ith. A.s.
Etiko - Ecological Farming Controlling Organization	2328	Certified	Yes	No	Yes	No	Yes	14	Taskin	Orhan	Taskin Tarim Ltd. Sti.
Etiko - Ecological Farming Controlling Organization	2387	Certified	No	No	Yes	Yes	No		Erensoy	Mehmet	Ares Organic Gida
Etiko - Ecological Farming Controlling Organization	2391	Certified	Yes	No	Yes	No	No		Baydogan	Vahap Baran	Vahap Baran Baydogan
Etiko - Ecological Farming Controlling Organization	2453	Certified	Yes	No	Yes	No	No		Allay	Servet	Oliva Gida Sanayi Tic. Ltd Sti
Etiko - Ecological Farming Controlling Organization	2475	Certified	Yes	No	Yes	No	Yes	47	Memur	Hayrettin	Meysan Organik Gida Tarim Urunleri San. Tic. Ltd. Sti.
Etiko - Ecological Farming Controlling Organization	2484	Certified	Yes	No	Yes	No	No		Ahraz	Adem	Meysut Gida Ve Makine San. Tic. Ltd. Sti.
Etiko - Ecological Farming Controlling Organization	2508	Certified	No	No	Yes	No	Yes	36	Kalkan	Kerem	Kalkan Organik
Etiko - Ecological Farming Controlling Organization	2516	Certified	Yes	No	No	No	No		Hamza	Talia	Arin Gida Tarim Urunleri San. Ve Tic. Ltd. Sti.
Etiko - Ecological Farming Controlling Organization	2527	Certified	No	No	Yes	No	No		Yilmaz	Sukru	Limkon Gida San Ve Tic As
Etiko - Ecological Farming Controlling Organization	2534	Certified	No	No	Yes	No	No		Bali	Atilla	WBT Tarim
Etiko - Ecological Farming Controlling Organization	2542	Certified	Yes	No	Yes	No	Yes	21	Illeez	Tolga	Ekoturka TR
Etiko - Ecological Farming Controlling Organization	2573	Certified	Yes	No	Yes	No	Yes		Ipek	Cafer	Cafer Ipek
Etiko - Ecological Farming Controlling Organization	2629	Certified	Yes	No	No	No	Yes	101	Ertelk	Engin	Bio Natural Tarim Ur. Turz. Ve Dan. San. Ve Tic. Ltd. Sti
Etiko - Ecological Farming Controlling Organization	2633	Certified	Yes	No	No	No	No		Sanin	Onur	Ason Dis Ticaret Limited Sirketi
Etiko - Ecological Farming Controlling Organization	2650	Certified	Yes	No	Yes	No	No		Kaner	Ozlem	Dohler Marmara Gida Sanayi A.s
Etiko - Ecological Farming Controlling Organization	2654	Certified	Yes	No	Yes	No	No		Kaya	Atif Yalcin	Nigella Tarim Hayvancilik Gida Peyzaj Ins. San. Tic. Ltd. Sti
Etiko - Ecological Farming Controlling Organization	2669	Certified	No	No	Yes	No	No		Yildirim	Cezmi	Gkm Gida ve Katki Maddeleri San. ve Tic. Ltd. St
Etiko - Ecological Farming Controlling Organization	3006	Certified	Yes	No	Yes	No	Yes	5	Chemodanov	Vladimir	Spelta Ltd.
Etiko - Ecological Farming Controlling Organization	3013	Certified	Yes	No	Yes	No	Yes	10	Rozinskiy	Dmitriy	Alef Ltd.
Etiko - Ecological Farming Controlling Organization	3020	Certified	Yes	No	Yes	No	No		Danilovich	Khantsevarov Vasily	Region Agro Ltd.
Etiko - Ecological Farming Controlling Organization	3026	Certified	No	No	Yes	Yes	Yes	15	Sojnikow	Jaroslav	Sibnut Ltd
Etiko - Ecological Farming Controlling Organization	3076	Certified	Yes	No	Yes	No	Yes	5	Vlasenko	Vladimir	Ukrainian Food Corporation Llc
Etiko - Ecological Farming Controlling Organization	3077	Certified	Yes	No	Yes	No	Yes	2	Sergeevich	Averchenko Stanislav	Too Proizvodstvenniy Komplex Mol-Tabys
Etiko - Ecological Farming Controlling Organization	3087	Certified	Yes	No	Yes	No	Yes	11	Kasyanenko	Kirill	Yugekotop Ltd
Etiko - Ecological Farming Controlling Organization	3090	Certified	Yes	No	Yes	No	Yes	9	Tarasjuk	Bogdan	Everltd.
Etiko - Ecological Farming Controlling Organization	3092	Certified	Yes	No	Yes	No	Yes	8	Livinskiy	Anatoliy	Grainagro Ltd.
Etiko - Ecological Farming Controlling Organization	3093	Certified	Yes	No	Yes	No	Yes	12.00	Sikoza	Valentin	Dnepr2
Etiko - Ecological Farming Controlling Organization	3094	Certified	Yes	No	Yes	No	Yes	4	Chemodanov	Vladimir	Polba Pe
Etiko - Ecological Farming Controlling Organization	3096	Certified	No	No	Yes	No	No		Potapenko	Maria	El Dorado Oils Llc
Etiko - Ecological Farming Controlling Organization	3114	Certified	Yes	No	Yes	No	Yes	19.00	Memur	Mesih	Farmeks Tarim Urunleri San Ve Tic Ltd Sti
Etiko - Ecological Farming Controlling Organization	3120	Certified	Yes	No	Yes	No	No	5.00	Sidorovich	Natalia	Sadeko Organic
Etiko - Ecological Farming Controlling Organization	3121	Certified	Yes	No	Yes	No	Yes	17.00	Illeez	Tolga	Ekoturka Ethiopia
Etiko - Ecological Farming Controlling Organization	3126	Certified	Yes	No	Yes	No	Yes	2.00	Illeez	Tolga	Ekoturka Kirghizistan
Etiko - Ecological Farming Controlling Organization	3127	Certified	Yes	No	Yes	No	Yes	5.00	Illeez	Tolga	Ekoturka Kazakhistan
Etiko - Ecological Farming Controlling Organization	3128	Certified	Yes	No	Yes	No	Yes	5.00	Illeez	Tolga	Ekotuka Russia
Etiko - Ecological Farming Controlling Organization	3132	Surrendered							Vasilenko	Alexander	Rodina Llc
Etiko - Ecological Farming Controlling Organization	3138	Surrendered							Jungkl	Lee	Daehanfeed
Etiko - Ecological Farming Controlling Organization	3140	Certified	Yes	No	Yes	No	Yes	7.00	Vlasenko	Vladimir	Tov Prodexim Ltd
Etiko - Ecological Farming Controlling Organization	3141	Certified	No	No	Yes	No	No		Kachovskiy	Alexiy	Ekolum Llc
Etiko - Ecological Farming Controlling Organization	3142	Certified	Yes	No	Yes	No	No		Yongmun	Kwon	Seominsang Rose Farm
Etiko - Ecological Farming Controlling Organization	3149	Certified	Yes	No	Yes	No	No		Jangjin	Kim	Janghueng Musangim Co Ltd
Etiko - Ecological Farming Controlling Organization	3170	Certified	Yes	No	Yes	No	Yes	6.00	Vladimirovich	Kaminskiy Andrey	Nt Nova Ltd.
Etiko - Ecological Farming Controlling Organization	3172	Certified	Yes	No	Yes	No	Yes	4.00	Sidorovich	Natalie	Art Seed Ltd.
Etiko - Ecological Farming Controlling Organization	3180	Certified	Yes	No	Yes	No	Yes	4.00	Rozinskiy	Dmitriy	Kazecotrade Ltd
Etiko - Ecological Farming Controlling Organization	3193	Certified	No	No	Yes	No	No		Bugorskiy	Evgeniy	Ojsc Vinnytsa Oil-and-Fat-Production Plant
Etiko - Ecological Farming Controlling Organization	3194	Certified	No	No	Yes	No	No		Victorovna	Lugovska Victoria	Nikmorservices Nikolaev Llc.
Etiko - Ecological Farming Controlling Organization	3195	Certified	No	No	Yes	No	No		Victorovich	Lytyvnov Iuri	Agro Supplies Llc

ree

fruit Aroma, Orange Concentrate, Orange NFC fruit juice, Orange Aroma, Lemon Concentrate, Lemon NFC fruit juice, Lemon Aroma, Mandarin Concentrate, Mandarin NFC fruit juice, Mandarin Aroma, Carrots Concentrate, Carrots Aroma, Black Carrots Concentrate, Black Carrots Aroma, Strawberry Concentrate, Strawberry Puree, Strawberry NFC fr

mpote, Pepper IQF, Dried Onions, Onions IQF

, Dried Beans, Dried Bulgur

'omegranate, Quince, Sourcherry, and Strawberry NFC Fruit Juice. Apple, Apricot, Black carrots, Carrot, Cherry, Grapefruits, Lemon, Mandarin, Orange, Peach, Pears, Pomegranate, Quince, Sourcherry, Strawberry and Tomatoes Aroma.

eans, Rice, Dried Sesame, Dried Figs, Dried Apricots, Dried Grape, Dried Plum, Dried Mulberry

erry Puree Concentrate
ier, Fresh Celery, Fresh Leek, Fresh Gold Strawberry, Fresh Stuffed Pepper, Cayenne Pepper, Fresh Melon, Fresh Watermelon, Fresh Onion, Fresh Garlic, Fresh Corn, Fresh Spinach, Fresh Broccoli, Fresh Cauliflower, Fresh Peas, Organic Tarhana, Organic Tomato Sauce, Organic Hot Sauce, Organic Eggplant with Basil Sauce, Organic Apple Vineg

Soybean Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds.
in Oil, Soybean Cake, Sunflower Seeds, Sunflower Oil, Sunflower Cake, Wheat Seeds.

wer Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds, Wheat Grouts, Wheat Flour Meal.

nel, Wheat Seeds.

nel, Wheat Seeds.

ds, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds.

eds, Wheat Seeds.

ieed Oil, Rapeseed Cake/Expeller, Rye Seeds, Rye Grouts, Rye Flour Meal, Sorghum Seeds, Sorghum Flour Meal, Soybean Seeds, Soybean Oil, Soybean Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds, Wheat Grouts, Wheat Flour Meal.

ustard Oil, Mustard Cake/Expeller, Oat Seeds, Oat Grouts, Oat Flour Meal, Peas Seeds, Peas Grouts, Pumpkin Seeds, Pumpkin Kernel, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Rye Seeds, Rye Grouts, Rye Flour Meal, Sorghum Seeds, Soybean Seeds, Soybean Oil, Soybean Cake/Expeller, Sunflower Seeds, Sunflower Oil, Sunfl

wer Seeds, Sunflower Oil, Sunflower Cake/Expeller, Walnut Kernel, Wheat Seeds, Wheat Grouts, Wheat Flour Meal.

Oat Seeds, Oat Grouts, Oat Flakes, Oat Brans, Oat Flour Meal, Peas Seeds, Peas Grouts, Peas Flakes, Pumpkin Kernel, Rapeseed Seeds, Rapeseed Oil, Rapeseed Cake/Expeller, Rye Seeds, Rye Grouts, Rye Flour Meal, Rye Flakes, Rye Brans, Rye Pasta, Sorghum Seeds, Soybean Seeds, Soybean Oil, Soybean Cake/Expeller, Spelt (Wheat) Seed

eat Flour Meal, Wheat Bran, Wheat Semolina.

ruit juice, Strawberry Aroma, Sour Cherry Concentrate, Sour Cherry Puree, Sour Cherry NFC fruit juice, Sour Cherry Aroma, Cherry Concentrate, Cherry Puree, Cherry NFC fruit juice, Cherry Aroma, Tomato Concentrate, Tomato Puree, Tomato Aroma, Apricot Concentrate, Apricot Puree, Apricot Aroma, Peaches Concentrate, Peaches Puree, Peache

jar, Organic home-made pasta, Grape Vinegar, Boiled Grape Juice, Mixed pickles, Dried Tomatoes, Dried Golden Berry, Boiled Apple juices

ver Cake/Expeller, Wheat Seeds, Wheat Grouts, Wheat Flour Meal, Wheat Bran, Wheat Semolina.

s, Spelt (Wheat) Grouts, Spelt (Wheat) Flakes, Spelt (Wheat) Brans, Spelt (Wheat) Pasta, Spelt (Wheat) Flour Meal, Sunflower Seeds, Sunflower Oil, Sunflower Cake/Expeller, Wheat Seeds, Wheat Grouts, Wheat Flour Meal, Wheat Bran, Wheat Pasta, Walnut Kernel.

s Aroma

From: ma@etko.org
To: [Zuck_Penelope - AMS](#); [Yang_RobertH - AMS](#); [AMS - AIAinbox](#)
Cc: ["Fatih AKSOY"](#)
Subject: FW: Registered: Notice of Non-compliance - Onsite Assessment
Date: Tuesday, June 23, 2015 5:56:56 PM
Attachments: [~WRD000.jpg](#)
[image001.png](#)
[Program Annual Training 2015 NOP-COR-IACB.doc](#)

Dear Ms Zuck, Mr Young

Please find attached training plan which we will realise soon in order to correct the noncompliances.

I will send you after the training updated procedres and results of the training as proof of corrective actions.

Sincerely

Mustafa Akyuz
ETKO Turkey

From: ma@etko.org [<mailto:ma@etko.org>]
Sent: Saturday, June 13, 2015 12:50 AM
To: 'Zuck Penelope - AMS'; 'Yang, RobertH - AMS'
Cc: 'AIAinbox@usda.gov'; 'Fatih AKSOY'
Subject: RE: Registered: Notice of Non-compliance - Onsite Assessment

Mrs Zuck

You can find attached ETKO Letter and Corrective Action Plan. For any remaining questions I am at your disposal.

Sincerely

Mustafa Akyuz

ETKO Turkey
160 Sokak No: 13/3 35100 Bornova
Izmir – Turkey.
www.etko.org

From: Penelope.Zuck@ams.usda.gov [<mailto:Penelope.Zuck@ams.usda.gov>]
Sent: Wednesday, May 13, 2015 9:22 PM
To: ma@etko.org
Cc: AIAinbox@ams.usda.gov; Renee.Mann@ams.usda.gov; RobertH.Yang@ams.usda.gov
Subject: Registered: Notice of Non-compliance - Onsite Assessment



This is a Registered Email[®] message from **Zuck Penelope - AMS**.

Dear Dr. Mustafa Akyuz,

Attached to this email is the NOP Notice of Noncompliance including the findings of the Ecological Farming Control Organization audit conducted on May 12-16, 2014. Corrective actions are due within 30 days of receipt of this notice.

A copy of the assessment report, NP4132LCA, is attached for your reference.

If you have questions on this notice, please do not hesitate to contact your Accreditation Manager, Robert Yang, at 202-690-4540 or RobertH.Yang@ams.usda.gov.

Best regards,
Penny



PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250
☎ 202.260.9444 | Fax 202.205.7808 | ✉ Penelope.Zuck@ams.usda.gov
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(06-09 July/Temmuz 2015)

PARTICIPANTS - KATILIMCILAR

Related ETKO Staff and Advisory Committee Members – İlgili ETKO Personeli ve Danışma Komitesi Üyeleri

Address: ETKO office - IZMIR

Program

Day 1 - 06 July/Temmuz 2015 Monday/Pazartesi

Time	Trainor	Subject	Procedures	Purpose
09.30 – 10.00	MA	NOP, COR and IACB Standard NOP, COR ve IACB Standardı hakkında bilgilendirme	OP 01 GP 18	Introduction, purpose, expectations
10.00 – 12.30	FA	IACB Standards, NOP, COR Regulation - Eşdeğer IACB Standardı ve NOP, COR Yönetmeliği		Explaining general system changes, important aspects Agriculture, Process and Wild collection. Ziraat, Doğal toplama ve Proses. Review: Application package, OCP and certification review Onsite inspection for production, document control, record keeping, input-output balance assessment, propagation material approval, retroactive recognition
12.30 – 13.30		Break		
13.30 – 14.00	MA	ETKO Inspection & Certification Procedures OP 01		Updated inspection and certification documents
14.00 – 14.30	YY	OP 03 Testing, TI 05 Sampling Method, TI 40 NOP Guide Testing & Enforcement Action		How to take samples, transport, laboratories, what to analyze, assessment of the results
14.30 – 15.00	MA	Risk analyses, Investigation of irregularities, unannounced inspections		
15.00 – 15.15		Break –Mola		
15.15 – 15.45	BG	Label assessment		
15.45 – 17.00		Workshops		Group 1: Review: Aim of the review, benefits, difficulties, type of reviews Group 2: Propagation material approval, seeds Group 3: Retroactive recognition
17.00 – 18.00		Presentation of workshop results		
		<u>Day2 - 07 July/Temmuz 2015 Tuesday/Salı</u>		

09.00 – 10.30	MA FA, ES SY YY BG ID HK ..	ETKO NOP Certification Procedure GP 18. ETKO Nop Sertifikasyon Prosedürü GP18.		Following topics will be explained: 1-How to use Regulations. (MA) 2- Labelling and label approval (BG) 3-National List 205&600-606 (YY) 4-Organic production and handling system plan 205&201 (FA) 5-Land requirements 205&202, buffer zone practice (ES) 6-Soil fertility and crop nutrient management 205&203 (HK) 7-Seeds and planting stock 205&204 (ID) 8-Crop rotation standard 205&205 (ID) 9-Pest, weed and disease management 205&206 (YY) 10-Wild crop harvesting 205&207, (SY) 11-Buffer zone practice will be studied and buffer zone evaluations will be made onsite. Inspectors will be monitored for this practice.
10.30 – 10.45		Break		
10.45 – 12.30	MA	NOP Adverse Action Procedure: 1-Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix. January 20, 2015, 2-NOP Penalty Matrix 2612 and 3-NOP 4011 Adverse Action Appeal Process for the		National Organic Program. These documents will be translated in Turkish in order to provide better understanding of the procedures by involved ETKO staff members.
12.30 – 13.30	BREAK			
13.30 - 15.00	SY	Grower Groups Inspection		What is the structure of a grower group, what aspects are the most important for inspection, how to do a grower group inspection
15.00 – 15.15	BREAK			
15.15 – 16.30		Workshops		Group 1: Example Review of OCP-Process identifying NCs Group 2: Example Review of OCP- Agriculture identifying NCs Group 3: Example Review of OCP-Wild collection identifying NCs How to identify noncompliance and report it, acc to IACB and NOP.
16.30 – 17.00		Presentation of workshop results		
17.00 – 18.00		Test		

09.00 – 19.00

Agriculture inspection. Treko/Arısu

**Day4-09 July/ Temmuz 2015 Thursday/Perşembe Onsite Inspection Training Process
NOP/COR/IACB**

09.00 – 19.00

Processing inspection Arısu

From: ma@etko.com.tr
To: [Reid, John - AMS](#)
Cc: [AMS - AIAinbox](#)
Subject: RE: [REMINDER] Notice of Accreditation Expiration - ETKO
Date: Saturday, February 04, 2017 10:13:39 AM
Attachments: [image001.jpg](#)

Mr Reid

Thank you for information, we will prepare necessary documents timely and provide you.

Sincerely

Mustafa Akyuz

ETKO – Turkey
+90-232-3397606
+90-232-3397607
www.etko.com.tr

From: Reid, John - AMS [mailto:John.Reid@ams.usda.gov]
Sent: Friday, February 03, 2017 11:56 PM
To: ma@etko.com.tr
Cc: AMS - AIAinbox
Subject: [REMINDER] Notice of Accreditation Expiration - ETKO
Importance: High

Dear Ecological Farming Control Organization:

The United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) is issuing this letter as a Notice of Impending Expiration of Accreditation, according to 7 CFR §§ 205.510(c)(1) and (2).

To avoid a lapse in accreditation, certifying agents must apply for renewal of accreditation at least 6 months prior to the [15th] anniversary of issuance of the Notification of Accreditation and each subsequent renewal of accreditation. The expiration accreditation date for ETKO is **1/22/18**, therefore your Application for Accreditation and all associated materials are due 6 months before this date.

The attached Annex 1 document provides instructions on what information and materials to submit with your accreditation renewal application.

The accreditation of certifying agents who make timely application for renewal of accreditation will not expire during the renewal process. The accreditation of certifying agents who fail to make timely application for renewal of accreditation will expire as scheduled unless renewed prior to the

scheduled expiration date. Certifying agents with an expired accreditation must not perform certification activities under the Act and USDA organic Regulations.

Following ETKO results of its accreditation renewal assessment, the AMS Administrator will determine whether the certifying agent remains in compliance with the Act and USDA organic regulations. Upon a determination that ETKO is in compliance, the AMS Administrator will issue accreditation renewal. If the AMS Administrator determines that ETKO is not in compliance with the Act and USDA organic regulations, the AMS Administrator will issue a denial of accreditation renewal.

We look forward to receiving and reviewing your materials.

Please feel free to contact me with any questions or concerns.

Respectfully,

John A. Reid



Program/Database Analyst
USDA | National Organic Program
1400 Independence Avenue SW | 2649-S | Washington DC 20250
Main: (202) 260-9452 | **Cell:** (b) (6)

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From: [Davis, Graham - AMS](#)
To: [AMS - AIAinbox](#)
Subject: RE: Corrective Action Report- ETKO
Date: Tuesday, January 10, 2017 7:57:27 AM
Attachments: [image002.jpg](#)
[image004.jpg](#)

Good to know. I think I have been sending them incorrectly for almost a year.

Graham

Graham Davis
Accreditation Manager
USDA | NATIONAL ORGANIC PROGRAM
1400 Independence Ave SW | 2649-S | Washington DC 20250
Desk: 202-692-0047 | Cell: (b) (6)



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From: AMS - AIAinbox
Sent: Tuesday, January 10, 2017 7:55 AM
To: Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: Corrective Action Report- ETKO

Hi Graham,

When you send these, please turn the Word document into a PDF so the certifier can use the PDF to pull the text of the noncompliances. If you just scan the document, they have a hard time doing this.

Thanks,
Renee

Renee Mann

Assistant Director, Accreditation and International Activities Division
USDA National Organic Program

From: Graham.Davis@ams.usda.gov [<mailto:Graham.Davis@ams.usda.gov>]
Sent: Tuesday, January 10, 2017 7:23 AM
To: ma@etko.com.tr
Cc: AMS - AIAinbox <AIAinbox@ams.usda.gov>
Subject: Registered: Corrective Action Report- ETKO



This is a Registered Email[®] message from **Davis Graham - AMS**.

Dear Dr. Akyuz,

Thank you for the submission of the corrective action plan on July 3, 2014. The USDA National Organic Program has reviewed your corrective action plan and found it to adequately address the concerns identified. During the next onsite assessment, we will verify that you have successfully implemented these changes and that the problem has not recurred.

Please contact me with any questions you may have.

Sincerely,

Graham

Graham Davis
Accreditation Manager
USDA | NATIONAL ORGANIC PROGRAM
1400 Independence Ave SW | 2649-S | Washington DC 20250
Desk: 202-692-0047 | Cell: (b) (6)



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From: ma@etko.org
To: [AMS - AIAinbox](#)
Cc: [McElroy, Bridget - AMS](#)
Subject: RE: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems
Date: Friday, March 18, 2016 1:44:23 PM

Dear Anne, Bridget

ETKO does not certify production of mentioned systems for NOP.

Hope this information is helpfull

Have a nice weekend.

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606

F: +90-232-3397607

www.etko.org

From: Baron , Anne - AMS [mailto:AnneP.Baron@ams.usda.gov] **On Behalf Of** AMS - AIAinbox
Sent: Wednesday, March 16, 2016 9:30 PM
To: AMS - AIAinbox
Subject: Reminder - Hydroponic, Aquaponic, Aeroponic and Associated Production Systems

This message is sent on behalf of Cheri Courtney, Accreditation and International Activities Division Director of the USDA National Organic Program.

Dear Certifiers:

Please remember to submit information about your certification of hydroponic, aquaponic, aeroponic, and associated production systems to Bridget McElroy at bridget.mcelroy@ams.usda.gov as soon as possible. The original message with instructions is below.

Regards,
Cheri Courtney
Director, Accreditation and International Activities Division

Original Message

The NOP is seeking information from certifying agents on the certification of hydroponic, aquaponic, aeroponic and associated production systems. This information is primarily for internal use. The NOP will not share information that identifies you as a certifying agent, or the operations that you certify.

What do we mean by hydroponic, aquaponic, aeroponic?

-

The exact definition of hydroponics can be unclear. In this case, we are asking about production systems of containment that derive the majority of nutrients for plants from water and/or small amounts of growing media. This includes both systems that rely on mineral nutrient solutions and those that rely on biological activity in the water or growing media for nutrient availability. This also includes aquaponic systems, which use fish effluent in the water as a nutrient supply. Examples of systems that fall under this category:

- Deep flow/raft
- Nutrient film technique (NFT)
- Ebb and flow
- Slab (lay-flat bags)
- Upright bags or Dutch buckets
- Troughs
- Towers
- Pots
- Aeroponics
- Aquaponics

Questions for Certifying Agents:

Do you certify hydroponic, aeroponic or aquaponic operations to the USDA organic standards?

If you certify hydroponic, aeroponic or aquaponics operations to the USDA organic standards, how many of these operations do you currently certify?

In what state or country (if international) are the certified operations located (list)?

What crops do these certified operations produce (list)?

Please send your response to Bridget McElroy, Policy Analyst at the following email by March 11: bridget.mcelroy@ams.usda.gov. You can also contact Bridget with any questions that you have.

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From: [Mann, Renee - AMS](#)
To: [Courtney, Cheri - AMS](#); [AMS - AIAinbox](#)
Subject: RE: Revocation of Certification NT NOVA
Date: Monday, May 18, 2015 4:41:08 PM
Attachments: [image001.png](#)

Hi Mario –

FYI – you would need to change the list of certified operations to identify this company as “Revoked.”

Thanks,
Renee M

Renee Mann
Assistant Director, Accreditation and International Activities Division
USDA National Organic Program
(202) 260-8635
[Join the NOP mailing list.](#)

From: Courtney, Cheri - AMS
Sent: Tuesday, May 12, 2015 9:26 AM
To: AMS - AIAinbox; Mann, Renee - AMS
Subject: RE: Revocation of Certification NT NOVA

Mario it appears this revocation was sent to the AIA inbox in error it should have been sent to NOPPACAAdverseActions@ams.usda.gov.

FYI -A revocation is similar to a suspension in that, if a certified operation is revoked it cannot sell product as organic. The major difference is if a certified operation is revoked it is ineligible for certification 5 years per the 205.662 (f)(2) - the regulations do not specify a timeframe for a suspension.

Regards,

Cheri

From: Essig, Mario - AMS **On Behalf Of** AMS - AIAinbox
Sent: Monday, May 11, 2015 12:42 PM
To: Courtney, Cheri - AMS; Mann, Renee - AMS
Subject: FW: Revocation of Certification NT NOVA

Hi Cheri and Renee,

Here is a revocation to be assigned.

Regards,
Mario Essig

| Mario Essig | Program Analyst | National Organic Program



USDA AMS | 1400 Independence Ave. SW RM 2648-S Washington, DC 20250

Mario.Essig@ams.usda.gov

Office #: 202.779.9466

[NOP website](#)

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From: ma@etko.org [<mailto:ma@etko.org>]
Sent: Thursday, April 30, 2015 6:47 AM
To: AMS - AIAinbox
Cc: 'Fatih Aksoy'
Subject: Revocation of Certification NT NOVA

Dear Madam / Sir

We would like to inform you that we revoked the NOP certification of NT Nova from Ukraine due to recent violation of the organic regulations.

Here you can find attached Notification and related Annexes.

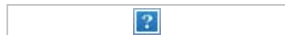
FYI: The product exported and subjected to residue problems was only certified according to EU Regulation.

I hope to inform you duly.

For any questions I am at your disposal.

Mustafa Akyuz
Man. Dir.
ETKO Turkey.
T: +90-232-3397606
F: +90-232-3397607

From: Penelope.Zuck@ams.usda.gov on behalf of [Zuck, Penelope - AMS](#)
To: mustafakyuz@hotmail.com
Cc: [AMS - AIAinbox; Claypool, Rebecca E - AMS](#)
Subject: Registered: Corrective Action Report - NP4132LCA
Date: Tuesday, July 19, 2016 1:31:28 PM
Attachments: [image001.png](#)
[NP4132LCA ETKO CA letter 07 19 16.pdf](#)
[NP4132LCA ETKO CA Report Settlement 07 19 16.pdf](#)



This is a Registered Email® message from **Zuck Penelope - AMS**.

Dear Mustafa,

Attached is the Corrective Action Report in accordance with the terms of the Settlement Agreement. Please let me know if you have any questions.

Best Regards,

Penny



PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250
☎ 202.260.9444 | ☎ 202.205.7808 | ✉ Penelope.Zuck@ams.usda.gov
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1400 Independence Avenue, SW
Room 2648-S, STOP 0268
Washington, DC 20250-0268

JUL 19 2016

Mustafa Akyuz
Ecological Farming Control Organization
160 Sk. No. 13/7, 35040
Bornova – Izmir
Turkey

Dear Dr. Akyuz:

On December 18, 2015, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), issued a Notice of Proposed Suspension of Ecological Farming Control Organization's (ETKO) accreditation as a result of the renewal assessment, which was appealed by ETKO. According to the terms of the executed Settlement Agreement APL-008-16 between the USDA-AMS and ETKO, the NOP accepts ETKO's corrective and preventative actions submitted in response to the NOP's May 13, 2015 Notice of Noncompliance.

The six noncompliances (NP4132LCA.NC1 – NC6) identified during the Renewal Assessment, and one noncompliance (NP9222ZZA.NC21) outstanding from the previous assessment were determined to be adequately addressed. See enclosed Corrective Action Report.

In addition, according to the terms of the Settlement Agreement, ETKO agrees to a site-evaluation at ETKO's expense, in accordance with 7 CFR parts 205.508(b) and 205.640(a), within twelve (12) months. The site-evaluation will focus on verifying implementation of the corrective and preventive actions outlined in the Corrective Action Report; a review of nonconformances issued by international accreditation bodies that resulted in the conditional losses of accreditation to the ISO 17065 Standard, the Canadian Food Inspection Agency's Canada Organic Regime, and the European Union Commission's 3rd country recognition as a certifying body; and a review of the corresponding corrective and preventive actions implemented to address the nonconformances.

If you have any questions about this notice or the USDA organic regulations, please contact Penny Zuck, Accreditation Manager, at Penelope.Zuck@ams.usda.gov or (202) 260-9444.

Sincerely,

A handwritten signature in black ink, appearing to read "Miles V. McEvoy", written over a circular stamp or seal.

Miles V. McEvoy
Deputy Administrator
National Organic Program

Enclosures: Corrective Action Report

cc: AIA Inbox

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) received Ecological Farming Control Organization’s (ETKO) renewal application to maintain its U.S. Department of Agriculture (USDA) National Organic Program accreditation. The NOP has reviewed ETKO’s application, conducted an onsite audit, and reviewed the audit report to determine ETKO’s capability to operate as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	ETKO – Ecological Farming Control Organization
Physical Address	160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey
Mailing Address	160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey
Contact & Title	Dr. Mustafa Akyuz General and QMS Manager
E-mail Address	ma@etko.org
Phone Number	+90-232-3397606
Reviewer(s) & Auditor(s)	Penny Zuck, NOP Reviewer Lars Crail, Onsite Auditor
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Action review: September 10 – November 3, 2015 NOP assessment review: April 29, 2015 Onsite Audit: May 12-16, 2014
Audit Identifier	NP4132LCA
Action Required	No
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ETKO’s certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	ETKO’s certification services in carrying out the audit criteria for Crops, Wild Crops, and Handling

Organizational Structure:

The Ecological Farming Control Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification for ETKO is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities.

ETKO was initially accredited as a certifying agent on January 22, 2003 to the USDA National Organic Program (NOP) for crops, wild crops, and handling. ETKO currently certifies operations to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine. As of May 2014, ETKO's NOP client list had 40 certified operations with 22 crops, 3 wild crops, and 39 handling operations. ETKO certifies to the Turkish Organic Standard under the legal authority of the Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and Co-ordination Council (TURKAK). ETKO is also accredited by TURKAK to perform conformity assessments for Turkey's Good Agricultural Practices (GAP). At the time of the renewal audit, ETKO was accredited to ISO 17065 by the International Organic Accreditation Service (IOAS) in the areas of agricultural production, processing and imports of organic agricultural products according to the EEC, GlobalGap, and the Global Organic Textile Standard (GOTS).

ETKO employees 22 staff members that are involved in USDA organic certification. The staff consists of five administrative personnel and 17 technical personnel which also conduct inspections. No contract inspectors are used.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether ETKO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP719900A.NC3 – Cleared
NP719900A.NC5 – Cleared
NP719900A.NC6 – Cleared
NP805000A.NC1 – Cleared
NP805000A.NC2 – Cleared
NP9222ZZA.NC1 – Cleared
NP9222ZZA.NC2 – Cleared
NP9222ZZA.NC3 – Cleared
NP9222ZZA.NC4 – Cleared
NP9222ZZA.NC5 – Cleared
NP9222ZZA.NC6 – Withdrawn
NP9222ZZA.NC7 – Cleared
NP9222ZZA.NC8 – Cleared

NP9222ZZA.NC9 – Cleared
NP9222ZZA.NC10 – Cleared
NP9222ZZA.NC11 – Cleared
NP9222ZZA.NC12 – Cleared
NP9222ZZA.NC13 – Cleared
NP9222ZZA.NC14 – Cleared
NP9222ZZA.NC15 – Cleared
NP9222ZZA.NC16 – Cleared
NP9222ZZA.NC17 – Cleared
NP9222ZZA.NC18 – Cleared
NP9222ZZA.NC19 – Cleared
NP9222ZZA.NC20 – Cleared

NP9222ZZA.NC21 – Accepted. 7 CFR §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.” *Interviews conducted, records reviewed, and witness inspections observed, verified a general lack of understanding of the NOP standards. While personnel had sufficient experience and education in organic agricultural production and handling practices, there was insufficient understanding on the application of the NOP standards as evidenced by inadequate information in the approved organic compliance (system) plans with no issues of concern or non-compliances being identified over multiple years of certification. The primary Certification Committee (CC) member with expertise in crops was not familiar with basic requirements such as the 90/120 day rule for raw manure application, did not know where to reference in the NOP Rule to determine if an input is permitted, and did not know when commercially available seeds and planting stock could be used. Additionally, while it was stated that the Certification Committee (CC) had received training there were no training records for any of the CC members prior to 2009.*

Corrective Action: ETKO conducted training of inspectors, reviewers, and Certification Committee members on November 21, 2009 and March 12-14, 2010 which covered NOP standards, review, inspection, and certification procedures. ETKO has designed a 2010 training plan to ensure periodic training on the NOP is completed. ETKO submitted records of training for all inspectors, reviewers, and Certification Committee members.

2014 Verification of Corrective Action: The NOP auditor found the following issues of concern that demonstrated an insufficient understanding of the USDA organic regulations and NOP policies:

1. Label review – the label review checklist did not include USDA organic regulation label requirements to be verified.
2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
3. OCP templates state the incorrect USDA organic regulations.
4. Inspectors are using outdated USDA organic regulations (2010).
5. Inspectors and reviewers not readily able to look up regulations.
6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.

7. Several crop operation OCPs reviewed by the NOP auditor indicated “Not Applicable” for Crop Rotation practice standard (205.205).
8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

2015 Corrective Action: ETKO submitted PowerPoint presentations, updated forms, training agenda, and training log of the training that was conducted for inspectors, staff, and advisory committee members. The documentation submitted also included copies of completed OCPs with documented buffer zones, and crop rotation practices.

ETKO has designated a responsible person to follow up on NOP updates to the Program Handbook and regulations. This person will translate all updates and provide them to staff members and inspectors by email and/or hardcopy. When necessary, related staff members will be trained for specific updates. The training will be recorded in the training register (new document) and the register will be provided to USDA with ETKO’s annual reporting. A copy of the training register form was submitted to NOP.

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as “**Accepted**,” indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP4132LCA.NC1 – Accepted. 7 CFR §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.” Furthermore, NOP 4009, Instruction – Who Needs to be Certified?, states “The OFPA requires that agricultural products sold or labeled as organically produced must be produced only on certified farms and handled only through certified handling operations (see 7 USC § 6506(a)(1)). The USDA organic regulations reiterate these requirements (see 7 CFR 205.100).”

Comments: *ETKO certifies projects that contain uncertified operations (i.e. contractors) that produce or handle organic products that are not certified entities.*

2015 Corrective Action: ETKO stated it will certify each subcontracted processing facility during the 2015 production period. ETKO sent a letter to all clients in August 2015 informing them of this requirement. ETKO issued a new instruction for staff, NOP Certification of Subcontracted Operators (TI 48), which describes the basic rules of subcontracted facilities under NOP certification requiring separate certification. ETKO updated the NOP procedure section 7.2.2.3 Processing and Handling Facilities, which requires subcontractors to be certified separately and refers to the instruction (TI 48) for details. ETKO staff was trained during the annual training in July 2015.

NP4132LCA.NC2 – Accepted. 7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *Certificates do not adequately indicate the certification scopes of Crop, Wild Crop, and Handling/Processing.*

2015 Corrective Action: ETKO submitted copies of corrected certificates identifying the scopes of certification. To prevent this from recurring, ETKO has updated the certificate template and the corrected form will now be used. ETKO submitted a copy of the revised template document with the correct NOP scopes of certification.

NP4132LCA.NC3 – Accepted. 7 CFR §205.662(c) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent... shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance....The notification of proposed suspension or revocation of certification shall state: (1) The reasons for the proposed suspension or revocation; (2) The proposed effective date of such suspension or revocation; (3) The impact of a suspension or revocation on future eligibility for certification; and (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.”

Comments: *ETKO suspended an operation without issuing a Notice of Proposed Suspension. The same operation after receiving the Notice of Suspension effective for 30 days was issued a Notice of Proposed Revocation and subsequently a Notice of Revocation. The sequence of issued notices and contents of the notifications demonstrate that ETKO does not fully comprehend the process of issuing notifications for noncompliances and adverse actions.*

2015 Corrective Action: ETKO has updated their procedures and trained staff and inspectors on the following: NOP 4002 Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix, NOP Penalty Matrix 2612 and NOP 4011 Adverse Action Appeal Process for the NOP. These documents were translated into Turkish in order to provide better understanding of the procedures by NOP involved ETKO staff members. The translated documents, training documents and agenda were submitted to NOP. Further, ETKO will check the NOP Handbook regularly and pertinent documents will be translated immediately. Translated documents will be studied with related staff and inspectors. ETKO submitted NOP Handbook documents to NOP as they were being translated.

NP4132LCA.NC4 – Accepted. 7 CFR §205.403(c) states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations of this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples.”

Comments: *The following issues were identified by the NOP auditor during a review of the operation files and witness audits:*

- 1. Inspectors did not completely verify the information stated in the Organic Compliance Plans. If observations and interviews at the onsite inspection did not align with the*

Organic Compliance Plan, the inspector failed to state this finding as an issue of concern.

2. *ETKO inspectors are responsible for collecting large amounts of information about the operations when the Organic Compliance Plan (OCP) is incomplete or in error. The inspector did not note the finding as an issue of concern, failing to indicate that the OCP is incomplete. The inspector did not record these findings in the inspection report. Minor updates or adjustments to the OCP during the onsite inspection is acceptable and can be noted in the inspector's report.*
3. *The inspection reports did not include a description and the outcome of the reconciliation activities (e.g. mass balance and audit trail audit) conducted by inspectors.*

2015 Corrective Action: ETKO submitted documentation from the training it conducted with inspectors on the following topics: “1) Using and evaluation of OCP during onsite inspection; 2) Review of organic compliance plans and identifying noncompliances before inspections, in order to avoid losing time to collect large amount of information and documents; and 3) How to make input-output balance and report it.” ETKO also submitted examples of completed inspection reports from inspectors showing input-output balance and updates to the inspection forms.

NP4132LCA.NC5 – Accepted. 7 CFR § 205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *During a crop witness audit observation, the NOP auditor noted that the inspector was not equipped and possibly not adequately trained to conduct sampling for pesticide residues. Product samples were collected during the crop inspection; however, the inspector collected the samples with bare hands potential exposing the samples to contamination and jeopardizing sample integrity.*

2015 Corrective Action: ETKO submitted training slides and updated forms used to conduct training for NOP inspectors, staff, and advisory committee members on the following topics: OP 03 Testing, TI 05 Sampling Method, TI 40 NOP Guide Testing & Enforcement Action. Training took place July 6-9, 2015.

NP4132LCA.NC6 – Accepted. 7 CFR § 205.501(a)(21) states “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms or conditions determined by the Administrator to be necessary.” NOP Policy Memo (PM) 11-10 (dated 01/21/11) states, “Grower group certification... accredited certifying agents should use the National Organic Standards Board (NOSB) recommendations of October 2002 and November 2008 as the current policies.”

Comments: *Grower Groups certified by ETKO do not have documented and functioning Internal Control Systems.*

2015 Corrective Action: ETKO created a form to be used for inspection of Internal Control Systems for grower groups and revised the OCP to include the grower group Internal Control System requirement. ETKO updated its NOP Certification Procedure Manual with the requirements to document and verify Internal Control Systems. These forms and procedures will

be implemented this year for all grower groups. The forms and revised NOP Certification Procedure Manual were submitted to NOP. ETKO conducted training on this topic July 7, 2015. The training materials and an agenda were submitted to NOP.

From: Penelope.Zuck@ams.usda.gov on behalf of [Zuck Penelope - AMS ma@etko.org](#)
To: [ma@etko.org](#)
Cc: [Claypool Rebecca E - AMS](#); [AMS - AIAinbox](#); [AMS - NOPAppeals](#)
Subject: Registered: Notice of Non-compliance - AIA6155PZ
Date: Tuesday, June 21, 2016 8:51:30 AM
Attachments: [image001.png](#)
[AIA6155PZ ETKO AR NoNC 06 21 16.pdf](#)



This is a Registered Email® message from **Zuck Penelope - AMS**.

Dear Dr. Akyuz,

Please see the attached Notice of Noncompliance to the USDA organic regulations. Corrective actions are due within 30 days of receipt of this notice. If you have questions on this notice, please do not hesitate to contact me.

Best regards,
Penny



PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER
USDA • AMS • NOP | 1400 Independence Ave SW| 2649-S | Washington DC 20250
☎ 202.260.9444 | Fax 202.205.7808 | ✉ Penelope.Zuck@ams.usda.gov
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NOTICE OF NONCOMPLIANCE

JUN 21 2016

Mustafa Akyuz
ETKO EKOLOJIC TARIM KONTROL ORG LTD STI
160 Sk. No. 13/7, 35040
Bornova – Izmir
Turkey

Dear Dr. Akyuz:

On January 22, 2016, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) received the 2016 annual report from Ecological Farming Control Organization (ETKO). We have determined that ETKO is noncompliant with the USDA organic regulations, 7 CFR Part 205, in the following manner:

AIA6155PZ.NC1 - 7 CFR § 205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603 Instruction Organic Certificates section 3.1 states, “Organic certificates should be issued in English and include the following (* identifies elements required by 7 CFR § 205.404 of the USDA organic regulations): ...Labeling category for each product certified under the handling/processing certification category (not required for products in the crops, wild crops, or livestock certification categories). Labeling categories: 100% Organic, Organic, Made with Organic (specified ingredients or food groups), and Livestock Feed (Organic or 100% Organic);...”

2016 Comments: *ETKO's USDA-NOP organic certificates include the category title “100-95% organic” for products in the “organic” category of certification. “100-95% organic” is not a category of USDA organic certification. The categories are “100% organic”, “organic”, and “made with organic (specified ingredients or food group(s)).”*

In order to clear this noncompliance, ETKO must propose and implement measures that will correct this action and prevent future reoccurrences. The proposed corrective actions must also indicate how the ETKO management system will be modified to prevent a future noncompliance. Please submit proposed corrective actions to AIAInbox@ams.usda.gov within 30 days from the date of receipt of this letter, indicating how this noncompliance will be corrected. Please refer to [NOP 2608](#), Responding to Noncompliances, for further instruction. Failure to promptly resolve this noncompliance may result in proposed adverse actions against ETKO as an accredited certifying agent for the USDA.

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If you have questions regarding this notice, please contact your Accreditation Manager, Rebecca Claypool, at Rebecca.E.Claypool@ams.usda.gov or (202) 350-5706.

Sincerely,



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

cc: NOP Appeals
AIA Inbox