SPECIFIC PROVISIONS FOR THE ACCREDITATION OF CONTROL BODIES FOR THE CERTIFICATION OF ORGANIC PRODUCTION

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DOCUMENT HISTORY

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0 **CC 12.12.2013**	New document Implementation of the mandatory document EA-3/12 M:2013	
1 **Secr 25.06.2014**	Update URL of the reference documents	Page 5
2 **Secr. 15.12.2015**	Correction/Update legislation	Page 15

SPECIFIC PROVISIONS FOR THE ACCREDITATION OF CONTROL BODIES FOR THE CERTIFICATION OF ORGANIC PRODUCTION

1. OBJECTIVES AND RERENCES TO NORMATIVE DOCUMENTS

This document

- is intended to document the specific requirements and guidelines that shall apply for the accreditation of control bodies for the certification of organic production according to the regulation EC n° 834/2007.
- integrates the requirements and guidelines included in the document EA-3/12:2013

It includes in particular the specific requirements for the accreditation process, applicable to the control bodies and to BELAC

The specific requirements and guidelines

- are only endorsed when they comply with the general criteria documented in BELAC document 1-03 ;
- complement the requirements and guidelines that are in force to all BELAC accreditation activities.

2. RECIPIENTS

With follow up of modifications:

- Members of the Coordination Commission
- Members of the Accreditation Board
- Accreditation secretariat
- Assessors and experts
- Accredited bodies

Without follow up of the modifications: Any external request

3. DESCRIPTION OF THE ACTIVITY

3.1 Identification of the activity	**ORG.PROD**
3.2 Type(s) of conformity assessment and accreditation standard	Product certification of organic production : • Accreditation according to NBN EN ISO 17065
3.3 Classification(s) according to BELAC 6-017	**9.2.1**
3.4 Reference document(s) for the activity ***(hereafter named "the scheme")*** , including the publication date or a version number	For control bodies operating in the EU : • Regulation (EC) Nº 834/2007 and associated implementing rules contained in Regulation (EC) Nº 889/2008, Regulation (EC) Nº 1235/2008 and subsequent amendments. • Working document of the Commission services on official controls in the organic sector dated 8 July 2011 (http://ec.europa.eu/agriculture/organic/documents/control-bodies/controls-working-document-20110708_en.pdf). • Other applicable documentation published by the European Commission regarding Regulation (EC) Nº 834/2007. For control bodies operating in third countries: • Titles III, IV and V of Regulation (EC) No 834/2007 and associated implementing rules contained in Regulation (EC) No 889/2008. • Regulation (EC) No 1235/2008. • European Commission Guidelines on imports of organic products intro the European Union (http://ec.europa.eu/agriculture/organic/documents/eu-policy/guidelines_for_imports_en.pdf). • Working document of the Commission services on official controls in the organic sector dated 8 July 2011 (http://ec.europa.eu/agriculture/organic/documents/control-bodies/controls-working-document-20110708_en.pdf). • Other applicable documentation published by the European Commission regarding Regulation (EC) Nº 834/2007. • *Codex Alimentarius* CAC/GL 32 Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods.
3.5 Body responsible for the development and maintenance of the scheme	EU

3.6 Definitions	
Control body	The term Control Body and its abbreviation CB is used to cover any independent body certifying organic production in the European Union which has been delegated these control tasks by a Member State in accordance Article 27 of Regulation (EC) Nº 834/2007 and any independent body which certifies organic production for the purpose of equivalence in third countries in accordance with Article 33 (3) of that Regulation. CB is synonym of Conformity Assessment Body (CAB), in this document is used CB in accordance with the EU regulation.
Critical location	Location where activities are conducted or controlled that determine or demonstrate the effectiveness of the CB performance of the accredited certification, in particular: • the process for initial qualification, training and ongoing monitoring of auditors and assessment personnel records; or • the application review, the assignment of assessment personnel, and/or review of the final report; or • the certification/registration decision based on the final review of the assessment report. (IAF GD 3:3003, point 2.2)
Equivalence	Equivalence is the capability of different inspection and certification systems to meet the same objectives of the production standards and the control measures contained in Titles III, IV and V of Regulation (EC) Nº 834/2007 and associated implementing rules contained in Regulation (EC) Nº 889/2008.
Control visit	Activity performed by BELAC whereby it conducts a post-audit review at the CB client premises, with the CB audit team or CB representatives being interviewed. Direct questioning to the CB client by the AB assessors should not occur, except where it was previously agreed with all parties concerned. Nevertheless, a guided visit through the CB client premises may be necessary.

4. SPECIFIC REQUIREMENTS APPLICABLE TO THE CONFORMITY ASSESSMENT BODY

4.1 Documents to be submitted by control bodies applying for accreditation

4.1.1 Control bodies need to submit at least the following:

- the complete list of offices, indicating for all, the certification activities carried out and countries covered;
- a copy of the CB's quality manual;
- an overview indicating the responsibilities of the staff;
- the standard control procedures [see art. 27 (6a) of Regulation (EC) Nº 834/2007] applied for all activities in the EU;
- list of qualified inspectors per product category;
- list of decision makers per product category.
- a current list of certified operators, including countries, locations and products certified.

The following documents shall be available on site and submitted on request:

- a copy of the most recent internal audit report, the control body's internal audit programme and the latest management review;
- curricula and supporting evidence of all Technical staff members and inspectors;
- declarations of absence of conflicts of interest for staff and inspectors;
- continuous training log indicating precisely for each staff member and inspector the nature of the training, dates, duration, attestations of successfully completed training received.

4.1.2 Additionally to the documents defined under point 4.1.1, control bodies operating in third countries need to submit at least the following:

- a description of their equivalent production standard and control measures;
- the standard control procedures applied for all activities in third countries;
- side by side comparison between the production standard and control measures of the CB and the EU regulation;
- inventory of substantial differences of the equivalent production standard and the control measures;
- an updated list of operators and of products certified as organic as foreseen by art. 12 (d) of Reg. (EC) Nº 1235/2008.

5. SPECIFIC REQUIREMENTS APPLICABLE TO BELAC WHEN EVALUATING CONTROL BODIES FOR THEIR OPERATIONS IN THE EUROPEAN UNION

5.1 Technical Assessor and Experts qualifications and training requirements

Technical assessors and experts should have a degree in a discipline related to the scope of accreditation (e.g. agronomist, food scientist), in case of assessors without a degree, additional professional experience has to be required. A minimum of two years professional experience in organic agriculture, aquaculture, food processing or in trade with products from organic production is required. Additionally, a minimum of two years professional activity with surveillance and/or assessment tasks in those technical areas where the assessor is assigned. Assessors and experts shall have adequate knowledge of the EU Regulations on Organic Production. Assessors and experts shall observe the relevant requirements for impartiality and occupational aptitude.

The initial and on-going training for assessors and experts shall cover the specific application of quality management systems according to ISO/IEC Guide 65 / ISO/IEC 17065 in a Control body certifying products from organic production as well as training in practical evaluations for the scope organic production.

5.2 Documents to be submitted by control bodies applying for accreditation

See under 4.1.1

5.3 Granting of initial accreditation / re-accreditation

BELAC shall not grant accreditation before having performed the following assessments: a head office assessment, an office assessment in each critical location and at least one witness assessment in each product category the control body has requested to be accredited for.

5.3.1 Office and witness/ control visit to be conducted for initial accreditation / re-accreditation

For initial accreditation and re-accreditation of control bodies operating exclusively in member states of the European Union, BELAC shall foresee the minimum number of man-days for office audits and the minimum number of witness assessments (preferably) / control visit as defined in table 1:

Table 1a: Minimum on-site times for office assessments (including general evaluation of the compliance with NBN EN ISO/IEC 17065 requirements)

							Man-days on site
							Standard minimum 2 days
Increase factors							
Critical findings	+ 1 day						
Structural complexity (*)	Low No additional		Medium + 0,5 day		High + 1 day		
Product categories	2 or less No additional		3 + 0,5 day		4 + 1 day		
Members States of activity	1-2 No additional		3-4 + 0,5 day		>4-10 + 1 day	>10 + 1,5 days	
Number of operators	<100 No additional	101 – 1000 + 0,5 day	1001 – 3000 +1 day	3001 – 6000 + 1,5 days	6001 - 10000 + 2 days	> 10000 + 2,5 days	
							Total

(*) elements to be considered for structural complexity are for example, number of inspectors, number of offices, CBs managing different product certification schemes, different accreditation scheme, outsourcing, decentralization of decision making, etc.

Table 1b: Minimum numbers of witness / control visit

		At least 1
Increase factors		
Critical findings	If necessary: additional WA/CV	
Product categories	1 per category (combinations of product categories is possible)	
Countries of activities / operators	+ 1 per each 10 countries with > 20 operators	
		Total

Each critical location shall be evaluated prior to initial accreditation. The days required, never less than half day, of this are to be added additionally to the minimum office assessment man-days as defined in table 1. Further, in the initial assessment, BELAC has to confirm the status of "not critical locations", sampling those offices in a representative number.

5.4 Extension of accreditation scope

5.4.1 Extension to additional product categories

Before granting an extension of the accreditation scope to any additional product category, BELAC shall verify that the Control body's inspectors have the necessary qualifications and shall perform at least one witness assessment in each additional product category for which the Control body requests to be accredited.

5.4.2 Extension of accreditation scope to organic product certification for the purpose of equivalence in third countries

Organic product certification for the purpose of equivalence in third countries shall be regarded as an extension of the accreditation scope. Before granting such an extension, BELAC shall refer to the requirements defined under point 6 for the granting of initial accreditation.

5.5 Evaluations during the accreditation cycle

5.5.1 Accreditation cycle

The length of the accreditation cycle should be no less than 4 years and no more than 5 years .

5.5.2 Surveillance assessments

BELAC shall conduct annual surveillance assessments during the accreditation cycle.

Each critical location shall be subject to at least one assessment in an accreditation cycle. Additional surveillance assessments shall be conducted at all critical locations where major non-conformities were identified during the previous assessment.

The minimum duration of a surveillance assessment shall be respectively at least 50% of the minimum calculated using table 1.

5.5.3 Witness assessments to be conducted during one accreditation cycle

BELAC shall witness at least one physical inspection in each product category during an accreditation cycle for which the control body is accredited, not taking into account the number of witness assessments conducted in the light of initial accreditation or reassessment. An additional witness audit has to be carried out for each ten countries. A single witness assessment could encompass different product categories if the activities of the witnessed operator and of the Control body justify it.

5.5.4 Witness assessments: criteria for the selection of operators to be witnessed

BELAC should select the witnessed inspectors and operators on its own, ensuring that witnessed assessments are performed in operators with a higher risks for deviations of organic production requirements. To establish which operators could present a higher risk for deviations, BELAC will take into account the risk analysis conducted by the CB in accordance with Article 27 (3) of Regulation (EC) Nº 834/2007.

When selecting a witnesses, BELAC shall also take into account the production cycles of each product, as relevant, in order to assure that products are present at the time. It is not adequate that witnessing covers exclusively activities that are essentially of an administrative nature (e.g. brokers, traders).

It is preferable that CB inspector(s) that have not been witnessed previously in that particular field of competence are selected. Witness assessments shall avoid the repeated witnessing of the same certification body client. Where repeat witnessing occurs because of the limited number of certified operators, the BELAC report shall indicate the repeat witnessing.

BELAC shall take into account previous results on witnessing to establish its witness strategy.

5.6 Information Exchange between BELAC, Member State's competent authority and the scheme owner

The Commission services as scheme owner and a Member State's Competent Authority as delegating authority may provide BELAC specific input for the assessment of CBs. BELAC shall consider surveillance results provided by Competent Authorities.

The BELAC report shall indicate whether the corrective measures requested during the previous assessment where implemented in a timely manner.

If BELAC decides to suspend the accreditation of a CB operating in a member state, BELAC shall inform in a timely manner the Competent Authority.

BELAC maintains the necessary contacts with the Belgian competent authorities and shall seek support from the national accreditation bodies of the other member States in order to establish the necessary contacts with the local competent authorities.

6. SPECIFIC REQUIREMENTS APPLICABLE TO BELAC WHEN EVALUATING CONTROL BODIES FOR THEIR OPERATIONS IN THIRD COUNTRIES

6.1 Technical Assessor and Experts qualifications

Additionally to the qualifications and training requirements defined under point 2.1, technical assessors and experts shall have adequate knowledge of *Codex Alimentarius* guidelines CAC/GL 32, the equivalent(s) standard(s) applied and experience with surveillance and/or assessment tasks in third countries.

6.2 Documents to be submitted by control bodies applying for accreditation

See under point 4.1.2

6.3 Granting of initial accreditation and re-accreditation

6.3.1 Equivalence assessment

Additionally to the requirements defined under point 5.3, BELAC shall not grant accreditation before having assessed the equivalence of the standard applied in the third country. The Control body in third countries shall present to BELAC a detailed description of its equivalent standard applied in third countries. The Control body shall ensure that those documents are up-to-date and cover all product categories for which the control body is seeking accreditation.

BELAC shall base its equivalence assessment on a side by side assessment prepared by the control body and verified by BELAC that demonstrates the equivalence of the production standard for each product category and of the control measures with Titles III, IV and V of Regulation (EC) Nº 834/2007 and associated implementing rules in Regulation (EC) No 889/2008.

The assessment shall include an inventory of the substantial differences between the control body's production standard and control measures and the Titles III, IV and V of Regulation (EC) Nº 834/2007 and associated implementing rules in Regulation (EC) Nº 889/2008 and provide a description of how the differences are resolved, taking into account the Codex Alimentarius Guidelines CAC/GL 32. The assessment should include a confirmation by BELAC of the equivalence of the production standard and the control measures.

An equivalence table should be used for the side by side assessment for production standard and control measures with Titles III, IV and V of Regulation (EC) No 834/2007 and associated implementing rules in Reg. 889/2008 as applied in third countries.

6.3.2 Office and witness/review audits to be conducted for initial accreditation / re-accreditation (including general evaluation of the compliance with NBN EN ISO/IEC 17065 requirements)

For initial accreditation and re-accreditation, BELAC shall foresee the minimum number of man-days for office audits and the minimum number of witness/review audits as defined in table 2. For control bodies operating within the EU and in third countries, the following table applies:

Table 2a: Minimum on-site times for office assessments

							Man-days on site
Increase factors							Standard minimum 2 days
Operators in the EU and in third countries	+ 1 day						
Group Certification	+ 1 day						
Critical findings	+ 1 day						
Structural complexity (*)	Low No addi.		Medium + 0,5 day		High + 1 day		
Product categories	2 or less No additional		3-4 0,5 day		>4 1 day		
Countries of activities	1-2 No additional		3-4 + 0,5 day		>4 -24 + 1 day	> 25 + 1,5 days	
Operator numbers	< 100 No addi.	101 – 1000 + 0,5 day	1001 –3000 +1 day	3001 – 6000 + 1,5 day	6001 - 10000 + 2 days	> 10000 + 2,5 days	
							Total

(*) elements to be considered for structural complexity are for example, number of inspectors, number of offices, CBs managing different product certification schemes, different accreditation scheme, outsourcing, decentralization of decision making, etc.

Table 2b: Minimum numbers of witness / control visit

		Witnessed assessments / Control visit for initial assessment
		At least 1
Increase factors		
Grower Group		**+1**
Critical findings	**If necessary: additional WA/CV**	
Product categories	**1 per category (combinations of product categories is possible)**	
Equivalent production standard	**1 per equivalent production standard**	
Countries of activities / operators	**+ 1 per each 10 countries with > 20 operators**	
		Total

Each critical location shall be evaluated prior to initial accreditation. The days required, never less than half day, of this are to be added additionally to the minimum office assessment man-days as defined in table 2. Additionally, in the initial assessment, BELAC shall confirm the status of "not critical locations", sampling those offices in a representative number.

BELAC shall select the third countries where to conduct the witness assessments taking account of:

- relevance of countries and noticed products affected by irregularities in the past;
- the number of operators certified in the third countries;
- whether producer groups are being certified in the third country;
- equal geographical distribution of witnessing in all Third Countries where inspection activities are carried out has to be considered.

6.4 Extension of accreditation scope to an additional product category

Additionally to the requirements mentioned under point 2.7, BELAC shall assess the equivalence of the organic production standard of the CB for the additional product category as defined previously.

6.5 Evaluations during the accreditation cycle

6.5.1 Surveillance assessments

Additionally to the requirements under point 2.9, each critical location in a third country shall be subject to at least one assessment in an accreditation cycle. Additional surveillance assessments shall be conducted in countries where major non-conformities were identified during the previous assessment.

The minimum duration of a surveillance assessment shall be at least 50% of the minimum on the basis of the calculation method in table 2.

The CB's shall inform BELAC in a timely manner of technical changes in the equivalent standard(s).

6.5.2 Witness assessments to be conducted during one accreditation cycle

Additionally to the requirements under point 2.10, BELAC shall witness at least one physical inspection in each product category during an accreditation cycle not taking into account the number of witness assessments conducted in the light of initial accreditation or reassessment. The witness assessments have to be conducted in a third country for which the control body is listed in annex IV of Regulation (EC) 1235/2008. A single witness assessment could encompass different product categories if the activities of the witnessed operator and of the Control body justify it.

BELAC shall select the third countries where to conduct the witness assessments taking account of:

- where relevant, the countries and products concerned by irregularities in the past;
- the number of operators certified in the third countries;
- whether producer groups are being certified in the third country;
- equal geographical distribution of witnessing in all third countries where inspection activities are carried out has to be considered.

6.6 Information Exchange between the accreditation body, Member State's competent authority and the scheme owner

Additionally to the requirements under point 5.6, the Commission Services, as the scheme owner may give BELAC specific input for the assessment of CBs operating in third countries, in particular about irregularities recorded in the OFIS-system. BELAC shall take into account surveillance results by Competent authorities of third countries and other accreditors.

If BELAC decides to suspend the accreditation of a CB operating in third countries, it shall inform in a timely manner the Commission services as the suspended CB cannot issue certificates of inspection during the duration of the suspension.

7 PRESENTATION OF THE ACCREDITATION SCHEDULE

7.1 Operations in the European Union

Products (Regulation n° 834/2007, art 27)	**Country or countries / region**	**Legislation**
a) live or unprocessed agricultural products b) processed agricultural products for use as food c) feed d) vegetative propagating material and seeds for cultivation	Belgium: en région Wallone	Règlement CE 834/2007 relatif à la production biologique et à l'étiquetage des produits biologiques et ses règlements d'application. Arrêté du Gouvernement wallon du 11 février 2010 concernant le mode de production et l'étiquetage des produits biologiques.
	Belgium: In het Vlaams Gewest	Verordening (EG) Nr. 834/2007 van de Raad inzake de biologische productie en de etikettering van biologische producten en haar uitvoeringsbesluiten. Besluit van de Vlaamse Regering van 12 december 2008 betreffende de biologische productie en etikettering van biologische producten.
	Belgium: En Région Bruxelloise / In het Gewest Brussel	Règlement CE 834/2007 relatif à la production biologique et à l'étiquetage des produits biologiques et ses règlements d'application / Verordening (EG) Nr. 834/2007 van de Raad inzake de biologische productie en de etikettering van biologische producten en haar uitvoeringsbesluiten. Arrêté du Gouvernement de la Région de Bruxelles-Capitale du 3 décembre 2009 concernant le mode de production biologique de produits agricoles et sa présentation sur les produits agricoles et les denrées alimentaires. / Besluit van de Regering van de Brussels Hoofdstedelijk Gewest van 3 december 2009 inzake de biologische productiemethode en aanduidingen dienaangaande op landbouwproducten en levensmiddelen.
	All other European countries when the assessment is done in the languages specified hereafter :	Council Regulation (EC) No 834/2007 on organic production and labeling of organic products with regard to organic production, labeling and control and its implementation regulations + specific legislation of the country where applicable

7.2. Operation in third countries (equivalence)

Products (Regulation n° 508/2012 – annex II)	**Country or countries**	**Legislation**
A. Unprocessed plant products B. Live animals or unprocessed animal products C. Aquaculture products and seaweeds D. Processed agricultural products for use as food E. Processed agricultural products for use as feed F. vegetative propagating material and seeds for cultivation	For the following third countries: AA BB .. when the assessment is done in the languages specified hereafter: XX YY …	CAB specific « third countries » document, developed corresponding point 3 b) of article 11 of the Commission Regulation (EC) n° 1235/2008 of 8 December 2008 laying down detailed rules for implementation of Council Regulation (EC) No 834/2007 as regards the arrangements for imports of organic products from third countries