

# Generic Guide for COrAA Organic Services

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## Table of Contents

<b>1. Definitions.....</b>	<b>4</b>
<b>2. Principles of COrAA Inspection and Certification.....</b>	<b>6</b>
<b>3. Certification Scheme Offered by COrAA .....</b>	<b>7</b>
<b>4. Different Scopes of Organic Certification .....</b>	<b>8</b>
<b>5. Organic Standards .....</b>	<b>9</b>
<b>6. Certification Requirements.....</b>	<b>10</b>
<b>7. Applying for Organic Certification .....</b>	<b>12</b>
7.1 Applying .....	12
7.2 Renewal of Certification .....	13
7.3 Changes of Certification .....	13
7.4 Withdrawal of the Application .....	13
7.5 Fee Payment.....	13
<b>8. Inspecting Production and Processing Units .....</b>	<b>15</b>
8.1 Inspector .....	15
8.2 Type of Inspection .....	15
8.3 Assignment of inspector .....	15
8.4 Inspection Protocol .....	16
8.5 Sampling for Residue Testing .....	17
<b>9. Certification and Certificate.....</b>	<b>18</b>
9.1 Certification .....	18
9.2 Decision Sheet .....	18
9.3 Issuing Certification Certificate .....	18
<b>10. Appeal of Certification Decision .....</b>	<b>20</b>
<b>11. Use of COrAA Logo .....</b>	<b>21</b>
<b>12. Sanctions.....</b>	<b>22</b>
<b>13. Measures after Suspension &amp; Decertification .....</b>	<b>23</b>
<b>14. Complaint .....</b>	<b>24</b>

## Scope of Document

This document is a generic manual for an operator wishing to apply for COrAA organic certification. In this manual, all steps of organic certification an applicant needs to know about are explained e.g. application process, standard compliance, inspection, certification, mark uses, etc.

## 1. Definitions

<b>Appeal</b>	Request by operator for reconsideration of an adverse finding made by the inspector or decision by the certification provider.
<b>Certification</b>	The procedure by which an operator or a group of operators receive written endorsement from a certification body that a clearly identified process has been methodically applied in order to assess that the operator or group of operators is producing specified products according to specific requirements or standards.
<b>(Organic) Certification Body</b>	A body responsible for verifying that a product sold or labeled as organic was produced, processed, prepared and handled according to set standards or requirements.
<b>Contractor</b>	An enterprise or person engaged by the operator to carry out specific tasks in the production process (including storage, handling and transport).
<b>Conversion Period</b>	A period from the beginning of doing organic agriculture according to COrAA standards until the produce is certified as organic. Conversion period is a time for ecological rehabilitation and soil fertility improvement
<b>Handling</b>	Manual or mechanical carrying, moving or working with something.
<b>Ingredient</b>	Any substance, including an additive, used in the manufacture or preparation of a product and is present in the final product although possibly in a modified form.
<b>Inspection</b>	Visit on site to verify that the performance of an operation is in accordance with specified standards/ requirements.
<b>Inspector</b>	Person appointed by a certification provider to undertake the inspection of an operator.
<b>Labelling</b>	Any written, printed or graphic matter that is present on the label, accompanies the produce/ product, or is displayed near the food, including that for the purpose of promoting its sale or disposal.
<b>Operation</b>	A business enterprise producing, processing or handling agricultural products.
<b>Operator</b>	An individual or business enterprise, responsible for ensuring that products meet the certification requirements.
<b>Organic Produce</b>	An agricultural produce that is produced or gathered from nature and handled in accordance with set organic standards/ requirements.
<b>Organic Product</b>	An agricultural product that is produced from ingredients and through operation in accordance with set organic standards/ requirements.
<b>Parallel</b>	A situation where an operation is producing visually

<b>Production</b>	indistinguishable produce/ products under both organic and a non-organic conditions. “Organic” and “in-conversion” production of the same product is parallel production. [Parallel production is a special instance of split production.]
<b>Processing</b>	The treatment, transformation [and/ or packaging] of agricultural or wild harvest produce/ product.
<b>Quality System</b>	Documented procedures, which are established, implemented, and periodically audited to assure that production, handling, management, certification and other systems meet specified requirements and outcomes by following standardized protocols.
<b>Sanctions</b>	Measures taken against assured operators who have failed to comply with COrAA norms.
<b>Standard</b>	Norms that specify how a product should be produced and processed.
<b>Subcontractor</b>	A person who is contracted to produce, handle or do processing of organic products.
<b>Surveillance</b>	The measures undertaken to provide ongoing market monitoring of COrAA assured operators’ compliance with COrAA norms.
<b>Violation</b>	Infringement by a licensed operator against the standards, certification procedures or contractual obligations to the certification body.

## 2. Principles of COrAA Inspection and Certification

COrAA organic inspection and certification is a process covering all steps from production to handling and processing. This normally is divided into 2 main areas:

(1) Farm production: inspection and certification of farm management from seeds, farm input, production management, buffer areas, harvesting to storage and packing.

(2) Processing and handling: inspection and certification of all handling activities from source of raw materials, handling, processing method, packing to transportation and sales.

In other words, this inspection is to verify that the organic product originates from a production process which is in compliance with applicable organic standards. COrAA certification does not certify that the product is free of any chemical residues. However, laboratory analysis of organic products may be conducted in a special circumstance if there is a suspicion of misuse of agrochemicals by the operator or a risk of external contamination.

Organic certification is a marketing tool. It makes consumers confident that they are purchasing authentic organic products. At the same time, it also helps to protect organic producers by giving certified operators the right to use the organic mark on their products.

To maintain the objectivity in inspection and certification, any marketing activity of any specific certified operator's organic products will not take place by COrAA. However, names and addresses of certified operators as well as the list of certified products will be provided to interested buyers and consumers in order to help promoting the organic market for the operators.

**COrAA will apply the same procedures to any operator who applied for certification. All operators will receive the same way of treatment (no-discrimination). None of them will be treated unequally on certification services by COrAA, regardless of differences in operational conditions such as size of farm/factory/grower group or existing certified units or amount of fee, etc.**

All contracted inspectors and COrAA staff will maintain all proprietary information of the operator acquired during inspection. No information will be disclosed unless the operator gives permission to do so (except when it is required by the law or for the purpose of accreditation and registration as an organic certification body). COrAA however reserves its right to disclose information about noncompliant producers /operators to the general public.

### 3. Certification Scheme Offered by COrAA

At present, COrAA offers organic certification.

#### (1) COrAA Organic Certification

Producers wishing to comply with the organic standards should convert their farms to a sustainable organic farming system. They may not use any chemical fertilizer or other chemical substances such as insecticides, herbicides and fungicides. Fertilization and crop protection must follow organic procedures as outlined in the standards. After a conversion period of 12 months, a farm can be certified as organic. For plantation with perennial crops (trees, shrubs, etc.), the conversion period is 18 months.

## 4. Different Scopes of Organic Certification

COrAA currently offers 3 certification scopes for different production and handling:

### **(1) Organic Crop Production**

Applicant is an owner of a farm or has contractors who grow organic crop for him/her. Organic crop production covers various kinds of plants such as rice, vegetables, fruits, field crops, herbs, sprouts from beans and cereals, mushrooms, seeds and planting materials.

In the crop production scope, applicant may also include family-based processing and packing of organic products from the own farm.

### **(2) Processing and Handling**

Applicant can be the operator or the services provided for the operator to process or handle organic products. The processing and handling scope covers all kinds of product handling such as grading, packing, storing (cold or room-temperature) and distribution. The processing involves activities that change the characteristics of the products. Organic ingredients may come from the applicant's own production farms or from contracted producers or may be bought from other certified operators.

### **(3) Grower Group Certification**

Applicant is a producer group or operator having a contract to purchase products from producers. Producer members may sell products to the applicant after the harvest or may do home-based simple processing before delivering the products to the applicant.

If the applicant has its own handling or processing of organic products, the applicant must apply for the handling and processing scope separately.



## 5. Organic Standards

Organic agriculture standards are important requirements which the operator must comply with in order to get the certification. COrAA uses the COrAA standards as a reference for its certification decision. Prior to the application, the operator should carefully study and ensure that he/she understands the requirements of the applicable COrAA standards.

If you are organized as a producer group, you may ask COrAA to hold a generic training for explaining the organic standards and how to apply them.

In case the applicant does manage the production or processing activities directly but contracts another person or entity to perform the work, the applicant has a responsibility to explain the standards and other certification requirements to the contractor. See more details in the section “Certification Requirements”.

### COrAA Organic Standards

COrAA Organic Standards are established based on the ASEAN Standard for Organic Agriculture (ASOA) and the Certification Alliance Standard. Certification Alliance or CertAll is a collaborative network of organic certification bodies working in Asia, aiming to enable organic farmers in the region to receive one stop services on organic certification.

COrAA’s standards are revised every 2 years. If you have any comments or proposal for amendment, please send in written comments to COrAA.

## 6. Certification Requirements

When applying for certification, the applicant must follow applicable national regulations and certification requirements besides the COrAA Standards. Requirements differ for different scopes of certification as well as from one organic schemes to another. Below are the requirements that all operators must comply with.

(1) Organic farming producers must maintain up-to-date records of

- \* purchase and application of farm input
- \* farm activities
- \* sale of organic produces (including the sale receipts)

These records and documents are to be inspected during farm inspection.

(2) Operators doing handling and/or processing of organic products must also maintain operation and production records such as organic ingredient purchase, the organic certificate of purchased ingredients, ingredient stock, product sale record (delivery note), equipment and room cleaning record, pest control record, complaints and other relevant records. These documents and records are to be verified by inspector to check what has happened during processing and handling process.

(3) Operator must allow inspector to check all production and operation documents, including sale records.

(4) Operator must allow inspector to check all land holdings (owned-land, rented land, rented-out land) as well as production and operation sites wherever applied or not applied for certification. These also include equipment storage, product storage, raw material storage, and houses. Operator may not necessarily be informed in advance of such inspection.

(5) Operator shall inform COrAA immediately if there is any change in certified production such as change of certified crop, certified operation facilities, including violation of organic standards.

(6) In case operator has contracted a partner for production, the operator must make sure that the contractors:

- \* adhere to COrAA organic standards and certification conditions
- \* permit COrAA inspector to inspect the production units and all relevant documents
- \* keep a copy of COrAA organic standards relevant to the contracted operation in an adapted language, contract agreement, production records and **relevant COrAA operator manuals**

\* adhere to COrAA's policies, procedures, conditions and other regulations that may come into force later.

(7) Operator must keep the above required records at least for 5 years for inspection.

## 7. Applying for Organic Certification

Applicants wishing to apply for organic certification of any scope and programme can contact COrAA office for the application pack. COrAA will create an application folder in Dropbox and share it with the applicant.

An application pack includes

\* Basic documents:

- Generic Guide for COrAA Organic Services
- COrAA Standards for Organic Production

\* Application documents according to the scope of certification:

- Application and agreement form
- Management Plan

Before completing the application, the applicant should study the details of the applicable standards and ensure that the applicant can comply with the standards and certification requirements.

Applicants can ask for advisory support from COrAA when filling the application or before. However, applicants will be required to pay in a case site visit is needed for advisory support.

### 7.1 Applying

Applicants must carefully fill the application documents which are:

- \* Application and agreement form
- \* Management plan

Information provided in the application is very important because correct and accurate information will benefit the applicant later.

Please take your time to prepare all information before completing the application. Before submitting the application, applicants should check the completeness of each document. Incomplete submissions may result in a delay in the inspection and certification process. Signing of the application and agreement is critical as COrAA cannot proceed to the next step if the signature is missing. An application is only valid on submission of relevant forms, information and supporting documentation. Submission must be made through the Applicant's Dropbox folder in digital format, including scan copies of supporting documentation.

## 7.2 Renewal of Certification

In the certification process, operators will be inspected by COrAA annually at least once a year and the certificate is valid for one year. Therefore, in order to continue the certification, the operator must renew his/her certification every year. COrAA will send a re-application form to the operator at the beginning of each year.

To renew the certification, the operator must fill the re-application form and submit it to COrAA together with the management plan. COrAA will use the reapplication information for planning the annual inspection and certification work.

The submission of the annual renewal application allows COrAA to issue a new certificate to replace the expired one as long as the certified production remains unchanged.

However, if the certified production has changed, the operator must inform COrAA of the change so that the changed production process is inspected and certified (see more details in “Additional Certification”) before renewing the certificate.

When the operator has made significant changes in the certified production, it must notify COrAA of the changes without delay so that COrAA can determine whether the change has any implication for the certified production and whether additional inspection and certification is required.

## 7.3 Changes of Certification

In the following cases, the operator must notify COrAA of the changes of certification.

- Change of product, resulting in a product different from the certified list, e.g. change from rice (certified) to corn cultivation
- Change of production e.g. expansion of the production field, new land bought for organic cultivation
- Addition of processed products
- Change of recipe or ingredient in the processed product, e.g. change of recipe for pineapple jam
- Change of field or production area e.g. acquirement of new land to cultivate organic rice or move a factory
- Change of processing or handling methods e.g. change from small rice milling machine to bigger machine

An operator wishing to apply for changes of certification can ask for the application form at COrAA office. After receiving the application, COrAA will decide whether an inspection is needed or certification can be done based on submitted documents. If

additional inspection is needed, COrAA will send the invoice for the additional inspection costs.

#### **7.4 Withdrawal of the Application**

Applicant may wish to withdraw the application at any stage by writing to COrAA (email is acceptable). COrAA however reserves the right not to refund fees already paid to COrAA.

#### **7.5 Fee Payment**

Please refer to the latest “COrAA Fee Schedule” and “COrAA Certification Process”

## 8. Inspecting Production and Processing Units

### 8.1 Inspector

All the inspectors are trained both theoretically and practically before being registered as COrAA inspector.

The inspector's job is to inspect farms and operating sites to verify that the information in the application and other documents (management plan) is correct. He/she also checks whether the production activities and management comply with applicable organic standards.

All inspection expenses are to be paid through COrAA. Inspectors have no right to demand any extra payment from the operator. Also, inspectors are not allowed to receive any valuable gift or present from the operator. If an operator encounters any inspector showing inappropriate behavior, the operator is requested to lodge a written complaint to COrAA.

### 8.2 Type of Inspection

Inspections can be divided into 3 types.

#### (1) Initial inspection

This is an important inspection where all farm units and relevant operation units are inspected. This inspection and assessment serves as guidance for the operator to understand and adjust its management to comply with applicable organic standards. It also serves as a basis for future inspection.

#### (2) Annual inspection

This is a regular inspection which must be performed annually at least once a year. Annual inspection is an announced inspection where the operator is informed of the inspection schedule in advance.

#### (3) Extraordinary inspection

This inspection is done in addition to the annual inspection. It is organized based on the needs from various reasons such as the applicant's request for extension of scope, a corrective action of certification decision, a complaint, suspicion or risk of noncompliance, appeal, or the COrAA internal quality assessment. This inspection may be announced or not announced.

### 8.3 Assignment of inspector

On completion of application/renewal submission, tentative dates for site inspection will be set between COrAA and the operator. The case file will be shared with the inspector through Dropbox. The assigned inspector will finalize the logistic arrangements directly with the operator for the inspection visit.

The operator has the right to object the assigned inspector. The objection must be accompanied by proper reason, e.g. the assigned inspector has a direct conflict of interest with the operator and his/her inspection may not be objective. The operator must submit the objection in writing to COrAA. However, COrAA reserves the right to decide whether to accept the objection and to assign another inspector to do the inspection.

#### **8.4 Inspection protocol**

For announced inspections, the operator must be present at the farm or operating site during the inspection visit on the date of inspection. In urgent cases, the operator may contact the inspector for re-scheduling the appointment.

The operator must cooperate with the inspector during the inspection whether announced or unannounced. For the announced inspection, the operator and responsible staff for the production and/or processing must be at the production site to provide information to the inspector.

If the operator causes a delay in the inspection, resulting in the increase of inspection costs. COrAA may charge an additional inspection fee.

In general, organic inspection is done with the following steps:

(1) Opening Interview:

The inspector introduces him/herself, the visit objective and inspection plan. Also issues arising from case review, if any.

(2) Site Inspection:

An accompanied walk about according to the production flow to review farming (both organic and conventional)/processing and handling measures from receiving inputs/ingredients, storage, production, post-harvest handling, storage (finished products), preparation and transportation for sale.

(3) Record Audit:

Review if farm/processing records to ascertain farm management/production handling including use of input/ingredients are duly recorded. Also cleaning, pest control and waste management.

(4) Input-Output Analysis:

Balance calculation of total number of in-stock and ingredients purchased against total production, sales and balance stock over a period of time, e.g. 1 month to 1 year.

(5) Product Labeling and Traceability:

Backtracing of selected finished product(s) to the production batch and batch/es of ingredient(s) used, suppliers and certification.

(6) Interviews:



During the visit, the inspector may request to interview farm/line workers and selected staff. Interviews may be conducted in private.

(7) Closing/Exit Report:

The inspector shares his/her findings, invites for comment and corrective action proposals in case of non-conformities, if any.

**The inspector's finding is not the final certification decision.**

Operators will receive a copy of the inspection report within 20 working days after the inspection. Operators may submit comments and/or additional submissions to COrAA. Operators are required to respond to the inspection findings within 14 working days, otherwise COrAA has the right to proceed to the certification decision without the operator's response. On receipt of operator's acceptance or feedback within 14 working days, COrAA will submit the case file and inspection report for certification decision.

### **8.5 Sampling for Residue Testing**

Normally, COrAA does not have a policy to use a laboratory analysis (chemical residue) for certification decision. This is because residue testing does not indicate how the organic production takes place. Besides, residue analysis is quite expensive and takes long time.

However, laboratory analysis of organic products may be conducted on a random basis, if there is a suspicion of use, contamination or co-mingling with non-permitted substances, the inspector may take sampling of water, soil or produce for chemical residue analysis at a laboratory.

When a sample is collected, the operator must sign off the sampling form. In addition, in case where ingredients or additives intended to be used for organic processing or risk of GMO contamination are suspected, the inspector may take sampling for GMO analysis.

The cost for laboratory analysis shall be borne by the operator, except when the testing is done as part of the COrAA internal quality control system.

## 9. Certification and Certificate

### 9.1 Certification

A certification officer will review the inspection report and make the certification decision. The operator is evaluated regarding its eligibility to it can be certified. The officer may impose corrective actions or make recommendations for the operator to fulfill.

Such corrective actions/recommendations can be:

- (1) Conditions to be fulfilled before the certification comes into effect, such as signing a contract between the operator and contractor and submit a copy to COrAA.
- (2) Conditions to be fulfilled within a set period, for example improving a buffer zone before the next growing season. Such conditions will be followed-up by COrAA. The follow-up may be in the next annual inspection or may need extra-inspection before the annual inspection in order to verify whether the certification condition has been fulfilled.
- (3) Recommendation is a recommendation (not a corrective action) that should be performed in order to complete the production system. It does not require the operator to comply with the recommended conditions. However, the recommendation may be changed into a corrective action in a certain case e.g. when the existing risk has increased or when there have been any changes made in COrAA organic requirements.

### 9.2 Decision sheet

Once the certification officer makes the decision, the applicant will receive a “decision sheet” from COrAA, informing him/her about corrective actions and recommendations. The operator signs off the letter if he/she agrees with the certification decision and corrective actions. The confirmation letter is to be sent back to COrAA.

In case the operator disagrees, he/she has the right to appeal the certification decision to COrAA within 30 days after receiving the decision sheet (see the details in the “Appeal” section below).

### 9.3 Issuing Certification Certificate

Certified operators will be issued a “Certificate of Organic Certification”. The operator can then use the COrAA logo on the organic certified products. Operators can mark certified products in conversion as “in conversion” but the use of the COrAA logo is not allowed for the in-conversion products.

Normally, the certificate is valid for one year from the date of issuance. However if COrAA finds serious non-compliance (in annual or extraordinary inspection) about

the violation of the organic standards, e.g. mixing of conventional with organic products, using prohibited ingredients in processed products, the certificate can be revoked instantly.

In the certificate, the operator's name and address as well as the certified farming area and products are specified. If there is any change in the production, e.g. change of recipe, processing method, or production unit, the operator must inform COrAA and apply for additional certification (see “Additional certification”).

## 10. Appeal of Certification Decision

If the operator is denied certification or disagrees with imposed certification conditions, he/she has the right to appeal (contractors have no rights for appeal but the operator can appeal the certification decision on the contractor).

The appeal process is as follows:

- (1) The operator submits an appeal letter together with additional information or evidence to COrAA. The appeal must be made within 30 days after receipt of the certification letter.
- (2) A COrAA manager will first review the case. If the appeal is based on misunderstanding of the operator about the certification decision or on a mistake made by COrAA staff, the manager will inform the appellant and/or correct the mistake.
- (3) If the appeal is justified, the manager will arrange for the appeal board to review the appeal. The operator will then be notified of the COrAA board's decision.
- (4) The decision of the appeal board is final.

## 11. Use of COrAA Logo

Only operators, whose certified organic products have completed the conversion time have the right to use the COrAA logo on their product packages for wholesaling and retailing.

Before using the COrAA logo, the operator must

- (1) Sign the “Logo Use Agreement” with COrAA
- (2) Comply with the Logo Use Policy
- (3) Send the draft of the package design to COrAA to approve before printing

## 12. Sanctions

After certification, if the operator is found violating organic standards or certification requirements, COrAA may impose sanction measures. The sanction depends on the severity of the violations. Forms of sanctions are:

- Warning letter
- Extra-ordinary inspection which the operator must pay for
- Monetary fine
- Restriction of mark use
- Suspension of certification
- Decertification

## 13. Measures after Suspension & Decertification

Sanctions by suspension and decertification may be imposed when there are violations of or noncompliance with organic standards, policies, agreements, or certification conditions, either with intention or by negligence.

When the operator's certification is suspended or terminated, the right to use the COrAA logo, previous COrAA organic marks and name(s) also ends.

The operator then must:

- (1) Stop packaging new products with the COrAA logo or/and previous COrAA organic marks and name(s) and destroy all remaining packages carrying the COrAA logo or/and previous COrAA organic marks and name(s) immediately or send the packages to COrAA in case of termination. The operator must bear the cost of such action.
- (2) COrAA may allow the suspended or decertified operator to sell the remaining products carrying the COrAA logo or/and previous COrAA organic marks and name(s) that are on stock on the date of suspension or decertification but the operator must enter into a contract with COrAA prior to the sale.
- (3) The operator has the right to appeal the suspension or de-certification decision but the suspension or decertification is still valid until the appeal decision reverses the earlier decision.
- (4) The decertified operator may be prohibited from re-applying for COrAA organic certification within a maximum of 3 years.

## 14. Complaint

Operators have the right to lodge complaints on all aspect of COrAA's work. This includes complaints about COrAA staff or inspectors, even complaints about non-compliance of other operators. Complaints should be in writing addressed to COrAA. Complaints should contain detailed information of the case and should include name and address of the complainant so that COrAA can contact him/her if further information is needed.

If the complainant wants to remain anonymous, COrAA may reserve the right not to investigate the complaint.

All information about the complainant is strictly confidential. Only those involved in the investigation may have access to this information. Also, lodging a complaint would not positively or negatively affect COrAA's services to the complainant.