



ANNEX 16

CU Inspection Regulation

For the CU certification and/or inspection programmes:

- **Organic Production**
 - EU, USDA, JAS, **NPOP**, Reglamento de la Normativa de la Producción Orgánica Agropecuaria, Organic Korea FIPA Food Industry Promotion Act, Organic Equivalence (Peru)
 - Input
- **Textile Certification**
 - Global Organic Textile Standards
 - Organic Exchange Blended and OE100
- **Global Recycle Standard (GRS)**
- **Globalgap**
 - IFA
 - Plant Propagation Material
- **TESCO Nurture**
- **Leaf-marque**
- **UTZ CERTIFIED**
- **FSC Forestry Certification**
 - Forest management
 - Chain of Custody
- **Marine Stewardship Council (MSC)**
- **PEFC**
- **Food Safety Programs**
 - HACCP (option A and B)
 - BRC
 - ISO22000
- **GMP**
- **Green Gold Label**
- **ISO 9001:2000**
- **Inspection programmes¹**

¹Only Paragraph 3 of Chapter 1 applies for these inspection programs

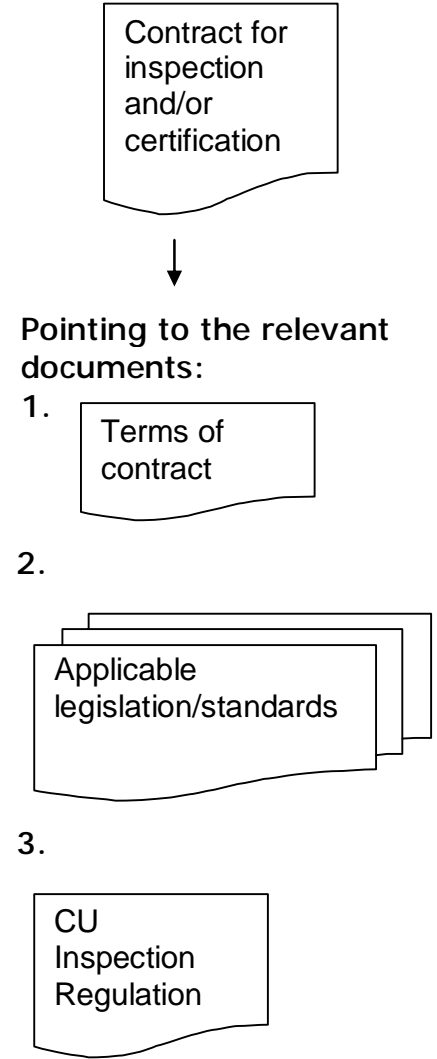
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CU Inspection Regulation

Introduction and Scope

This Inspection Regulation contains regulation regarding our policy on inspection and certification. It mentions what your rights and obligations are, as well as those of CU. It also mentions additional rules for specific programs. It also contains contract-related regulation. In this sense the Inspection Regulation is complementary to the applicable standards, the offer letter, as well as the Terms of Contract. Please refer to the structure diagram below.



The Inspection Regulation consists of several chapters. Chapter 1 contains general rules that are applicable for all clients concerned and contains the following paragraphs:

1. Applicability
2. Definitions
3. Inspection
4. Inspection report
5. Lapsed
6. Certification
7. Certificates
8. Use of indications and symbols
9. Appeal
10. Final provisions

The other chapters contain rules specified for individual certification programs. In every sentence where the singular form is in a context, the plural form should be supposed. This is also the case for male and female word expressions.

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Chapter 1

Paragraph 1 Applicability

Article 1 Applicability

1. This regulation has been adopted by the Managing Director of the private limited company Control Union Certifications (CU) on 1 August 2005, and can be referred to as **CU Inspection Regulation**.
2. The Managing Director CU has the right to change or extend this regulation by amendments. The amendments shall be mentioned in italics.
3. The CU Inspection regulation and the amendments shall be published within one month after the Managing Director CU has adopted them.
4. For any change or extension of this regulation, a transition period is given. In all cases where no transition period for the individual amendment is given, a transition period of three months after the adoption will be in force.
5. The CU Inspection regulation is applicable for all programs mentioned in the scope.
6. In any case where conflicting rules in both the client contract and the CU Inspection regulation are encountered, the client contract shall overrule the CU Inspection regulation.
7. Control Union Certifications commits itself to conduct its activities impartially and in a professional manner. CU understands the importance of impartiality in carrying out its certification activities, managing of conflicts of interest and ensuring the objectivity of its management system certification activities.

Paragraph 2 Definitions

Article 2 Definitions

1. This document adopts all definitions as defined by:
 - Regulation (EEC) No 834/2007 and 889/2008 **and their amendments**
 - National Organic Program, USDA United States of America
 - Japanese Agricultural Standards, MAFF Japan
 - National Program Organic Production , APEDA, INdia
 - GLOBALGAP Normative documents
 - Global Organic Textile Standards (GOTS, formerly EKO Sustainable Textile)
 - Organic Exchange Guidelines
 - CU Standards for Inputs in CU Certification Programs
 - CU Forestry Standards
 - BRC Global Standard for Food

- HACCP Requirement for a HACCP based Food Safety System
 - GMO General Standards for the Animal Feed Sector
 - CU standards for the production of wine and beverages derived there from
 - General requirements for bodies operating product certification systems (ISO/IEC Guide 65: 1996 – EN45011)
 - ISO 9001:2000, ISO 9000, ISO 19011, ISO 17021
- and uses the following additional definitions:

- **Appeal** An appeal is a disagreement with a certification decision of Control Union Certifications by a client.
- **Audit** A systematic examination to substantiate whether activities and related results comply with the planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
- **Auditor** Person who carries out an audit. Auditor is responsible for the reporting to the Program Manager or Certifier.
- **Certification** Action by a party (in this case: the certification body, CU), to confirm there is satisfactory confidence that a sufficiently identified product, process or activity is in conformity with a standard, regulation or rule.
- **Certification body** Body that conducts certification of conformity.
- **Certification program** A system (or program) that has its own procedure and management for carrying out certification of conformity.
- **Certifier** Person who under supervision of the Program Manager is responsible for marketing of program, instructions to the (Senior) Inspector, certification decision, reporting to the client, issuance of certificates, customer relations and post certification activities.
- **Client** Contract partner of CU for inspection and certification programs, with the aim of being inspected and certified.
- **Client contract** Written agreement between CU and the client concerning all rights and duties concerning a CU certification program. The client contract does not indicate that the client is certified.

- Client number Unique number that CU provides the client to identify himself as a CU client. The client number does not indicate that the client is certified.
- Complaint Formal expression of dissatisfaction by any person or organization to Control Union Certifications.
- EU / EC European Union or European Commission.
- Farm Assurers GLOBALG.A.P approved Farm Assurers are organizations (e.g. CB, producer group organizations, standard owners, consultants, etc.) that have signed a License Agreement with GLOBALG.A.P and acquired the right from producers to upload and/or register these producer activities in the GLOBALG.A.P Database. The service includes the first registration and any subsequent modifications as well as settings of links in the database. The approved Farm Assurer must be granted these rights in writing from the producer or other legal entity in the GLOBALG.A.P system.
- GlobalGAP Scheme Manager The official GlobalGAP representative of CU Head Office, responsible for the CU GlobalGAP program, and the communication with the owner of GlobalGAP (FoodPLUS). The Scheme Manager is responsible for the development and maintenance of certification programs, instructions to the Certifier and (Senior) Inspector, (approval of) certification decision, reporting to the client, issuance of certificates, and post certification activities.
- Evaluation A systematic examination of the extent to which a product, process or service fulfils a specific requirement.
- FoodPLUS The official GlobalGAP organisation.
- IAF Sampling Guidelines An international guideline used in order to determine the surveillance frequency of PMO's.
- Import certificate Officially referred to as "Certificate of Inspection". Certificate in which CU declares based on an issued scope certificate that a certain lot of products that is produced outside the EU and imported into the EU is inspected and positively evaluated according to the regulations as mentioned in Regulation (EEC) No. 834/2007 and 889/2008.

- **Input** A product or auxiliary for which standards in a CU certification program (apart from the certification program for 'Inputs') are applicable, except the materials that are subject in the certification program.
- **Inspection** Investigation by means of competent judgement and/or by means of testing of a product, process or activity and determination of its conformity with a standard or other normative document; this includes inventories (first inspections).
- **Inspector** Person who is responsible for the execution of inspections and reporting to the Program Manager or Certifier and client.
- **Non-conformity** Deviation of product from specified requirements, or the failure to maintain one or more required management system elements.
- **Organic Production Methods** Production Method as described in Regulation (EEC) No. 834/2007 and 889/2008, National Organic Program (USDA) and/or Japanese Standards for Organic production Method or applicable CU standards.
- **Origin** For the purpose of issuing a GMO free declaration: Cultivation, production or breeding method to create or change the original organism (e.g. organic production method, gene technology as described on article 2 of Directive 90/220/EEC by the council of 23 April 1990 concerning the introduction of genetically modified organisms in the environment on purpose.
- **PMO** Produce Marketing Organisation (PMO) or grower association participating (grower group) in the GlobalGAP program. PMO is referring to Option 2 (group) certification.
- **Processing unit** Companies or company unit where actions are carried out defined under "preparation" in the different normative documents.
- **Product specification** Declaration in which a producer / processor specifies all ingredients in the product concerned.
- **Production unit** Companies or company unit where actions are carried out defined under "production" in Regulation (EEC) No. 834/2007 and 889/2008. Also mentioned agricultural units or farmers units (for organic production) or forestry management units (for forestry).

Article 4 Inspector

1. The CU inspector shall be able to identify himself with a valid CU identification card.
2. The CU inspector shall operate in conformity with the CU procedures.
3. The CU inspector shall also respect the CU Code of Conduct, which is signed by him/her.

Article 5 Inspection

1. Lapsed
2. CU has the right to carry out announced and unannounced inspections. CU has the right to carry out additional inspection activities for certification purposes and to charge the costs in addition to the fees as stated in the client contract.
3. See valid Terms of Contract art. 4.3.
4. CU has the right to request additional information whenever it believes this to be necessary to guarantee that the regulations are observed and are verifiable.
5. If requested by CU, translation services from the local language into a language chosen by CU staff shall be provided. CU shall decide whether CU or the client shall provide the inspector translation services. The costs will be charged to the client.
6. For NOP organic program, the US Administrator or State organic program's governing State official may require that additional inspections be performed by CU for the purpose of determining compliance with the National Organic Program.

Article 5a Subject of evaluation

1. Lapsed
2. During the inspection, performed after the application for a new or changed certificate, the requirements for the process of preparation or marketing can be evaluated in a comparable process. Comparable process can also be defined as preparation or marketing of the same or comparable conventional product.
3. If a certificate was granted based on review of the comparable process, the client is obliged to inform CUC before first processing. CUC may decide to carry out an additional evaluation.

Article 5b Method of evaluation/inspection

Evaluation whether the applicable requirements are met, can be performed by the following methods:

1. Administrative evaluation at a CU Office;
2. Physical and administrative evaluation at the client's project or elsewhere;
3. Sampling and analysis;
4. Interviews;
5. Cross-checking information received from all of the above.

Article 6 Samples

1. The inspector has the right to take samples for analysis.
2. lapsed
3. See valid Terms of Contract art. 4.4.
4. When samples are taken, the inspector shall provide the client with a duplicate of the sample that is taken.
5. CU shall carry out the analyses on samples by laboratories that are accredited according to EN 45001 / ISO/IEC 17025 and inform the client as soon as the results are available.

An exception exists for NOP Organic and GMP certification. These exceptions are discussed in the respective paragraphs.

6. Moved to chapter 2
7. If the results of the analyses prove that the applicable regulations are not complied with, the results may cause changes in the certification.
8. For certification programmes Organic Exchange and Global Organic Textile Standards the following additional rule applies: Companies that receive certified organic lint cotton or raw cotton, which was not certified by CUC, shall take a representative sample of each transport of organic (raw or ginned) cotton. The samples shall be sent to a laboratory, which is accredited for GM cotton analyses as per the ISO 17025 standard. The results of these analyses shall be kept available for the CUC auditor. Not taking samples or not keeping them available to Control Union Certifications will affect our certification decision.

Article 7 Register complaints and remedial actions

1. The client shall safeguard that all complaints received from: 1. Anyone at any stage of the project (production- and processing units), 2. customers and/or 3. other third parties are centrally registered. This client shall keep records of all received complaints concerning the certified production method or products and of all remedial actions that are taken to respond to the individual complaints. Clients must have on location, and available on request a clearly identifiable document for customers complaints. There are documents of the actions taken with respect to such complaints and any deficiencies found in products or services. The complaints procedure must ensure that complaints are adequately recorded, studied and followed up, including a record of actions taken with respect to complaints and any deficiencies found in products or services.

Article 8 Responsibility and Liability

1. The client has the responsibility for all production and processing units and products and activities that are mentioned in the client contract to comply with the applicable standards.
2. The client shall, with regard to the inspection and certification activities of CU, be responsible for persons who work in or for his business.
3. Lapsed
4. Lapsed

Paragraph 4 Inspection report

Article 9 Inspection report

1. During the inspection, the inspector shall record his findings on standardized inspection forms. These forms have to be signed by the client or the official representative of the client during the inspection visit to acknowledge the inspector's findings. If the official representative signs, his/her signature is only valid if this person is officially registered as authorized to sign within the company.
2. The inspector shall provide the Certifier with all inspection forms with his findings as to the conformity with all the certification requirements.
3. The findings in the inspection forms shall be evaluated and signed by the certifier, be signed by the certifier.

4. After an inspection has taken place CU shall send a summary of the evaluation to the client without undue delay, moreover conforming to any program specific requirements. The client has the right to react on the content of the report within a fixed (program specific) timeframe after sending by CU (date of postmark). If necessary, the client can ask CU for an extended period to react.
5. CU has the right to charge a fee for providing copies of the reports, as well as carry out other services if this is permitted by the client concerned.
6. Lapsed

Paragraph 5 Non-conformities and sanctions

Lapsed

Article 10 Moved to chapter 2

Article 11 Lapsed

Paragraph 6 Certification

Article 12 Certification

1. Lapsed
2. Based on the certification decision, CU will issue, update or withdraw the scope certificate.
3. CU has the right to publish the list of its suspended clients.

Paragraph 7 Certificates

Article 13 Scope certificate

1. The scope certificate is only valid if signed by the managing director of CU or a person who has been authorized for it by the managing director.
2. CU shall renew the scope certificate within the timeframe indicated in the applicable standards as long as the circumstances are not in conflict with the applicable regulations, the client contract is continued, and financial liabilities are fulfilled.
3. The client shall keep the valid certificate issued in his records.
4. CU has the right to request clients to return any certificates (e.g. scope certificates, Import or Transaction Certificates), as these are legally owned by CU.
5. CU shall keep a copy of the scope certificate for authenticity in its records.
6. Lapsed
7. The scope certificate shall contain an indication of:

- the name and address of the client;
- the client number;
- the certified products and related units;
- the applicable certification program;
- the standards, regulation or other normative documents to which each product, production unit, or processing unit is certified;
- the effective date of certification and / or place and date of issue of the certificate;
- a hologram;
- any program specific indications applicable.

Article 14 Moved to chapter 2

Article 15 Invalidity and duplicates of certificates

1. The client is obliged to inform CU as soon as possible if any changes occur which interfere or might interfere with the requirements as mentioned in the concerned regulations. If these changes are not reported to CU, the scope certificate loses its validity.
4. From the moment of termination of the client contract, the scope certificate issued becomes invalid.
5. In the event of the certificate being lost by the client, the rights to be derived from the certificate shall cease to exist. In those cases, CU shall only issue a new copy of the certificate if the client concerned provides CU with a written declaration in which the client obliges himself to return the original certificate when it is found.
6. In the event of invalidity of a certificate, CU has the right to notify buyers concerned, inspection bodies concerned, competent authorities and other third parties concerned.
7. CU has the right to confirm validity of certificates that are issued by CU on request of third parties, without prior permission of the client.

Article 16 Accreditation

1. CU obliges itself to be accredited or recognized by:
 - the Dutch Accreditation Council RvA for the certification programs Organic Production according EU legislation 834/2007 and 889/2008., GlobalGAP, GGL, PEFC and GOTS. The RvA is member of EA (European co-operation for Accreditation) and IAF (International Accreditation Forum),
 - USA Ministry of Agriculture for requirements on organic products and agricultural processed food;
 - **Japan Ministry of Agriculture for requirements on naturally grown chickens (jidoriniku), organic agricultural products, organic processed food and organic feed;**
 - Indian Ministry of Agriculture for requirements on organic production;

- Turkish Ministry of Agriculture for requirements on organic production;
 - Conseil des appellations réservées et des termes valorisants (CARTV), from the Canadian province of Quebec for requirements on organic production;
 - FoodPLUS for the certification program GlobalGAP;
 - The Foundation Skal ;
 - The Forest Stewardship Council (FSC) for the program Management of Natural Forest, Forest Plantations, Chain-of-Custody and Group Certification and to award the FSC logo;
 - NSF-CMi (Checkmate International, U.K.) to carry out Tesco Nature's Choice audits
 - UTZ CERTIFIED (Utz Kapeh) organization for UTZ inspection and certification;
 - Various organizations or labels for sustainable or organic products.
2. CU shall give a copy of the accreditation certificates on request to the client.
 3. CU has the right to show the accreditation bodies insight into all records containing client information.

Paragraph 8 Use of indications and symbols

Article 17 Use of indications and symbols

1. From the moment CU has issued the scope certificate, the client has the right to use indications, statements and symbols as referred to on the scope certificate on products or with regard to processing activities as mentioned on the scope certificate.
2. The use of indications that refer to the certified production method or to CU is only allowed after the concerned scope certificate has been issued
3. Lapsed
4. Lapsed
5. Labels and logos shall be evaluated during the inspection.
6. Lapsed
7. Lapsed
8. Use of labels and logos must be according to the program specific requirements.
9. Certified clients are entitled to use the CU logo according the requirements described in Annex H

Paragraph 9 Appeals/Complaints

Article 18 Appeals/Complaints

- For Appeals against certification decisions :See valid Terms of Contract art. 13.1.
- See valid Terms of Contract art. 13.1.

- If you wish to submit a complaint to Control Union Certifications, please use the form in annex K.
- We kindly request you to specify your complaint as much as possible (“who, what, where, when”) and provide any necessary documentation if applicable.
- You can send this form with any attachments to our certification branch offices or to our office in Zwolle, The Netherlands (certification@controlunion.com, fax: +31-38-4237040).
- An appropriate member of staff (certifier / manager) will confirm receipt of your complaint, with a timeframe of handling the complaint, within two weeks if no improvement can be made before that time.
- The Quality Manager, Program Manager or Certifier will inform the complainant of the results in writing or verbally, depending on the size and nature of the complaint.
- Incomplete complaints cannot be processed.

Paragraph 10 Final provisions

Article 19 Documents and publication

1. The language in which all documentation, regulations and communication shall take place is English, unless otherwise agreed or otherwise mentioned in an individual document.
2. CU shall have all normative documents as mentioned in this regulation available at its web-site and (on paper) at the CU head office.
3. CU is entitled to modify the CU documents and regulations and shall publish them as amendments for existing clients.
4. In the event that changes are made in documents or regulations, CU shall inform the client concerned in writing about the changes and about the day they come into effect.
5. The client is unconditionally bound to the changed documents and regulations from the day they come into effect.
6. CU has the right to publish a list with clients’ names and addresses, type of production/processing activities and products.
7. Lapsed

Article 20 Cases not covered by this regulation

1. The managing Director CU shall decide in all cases not covered by this regulation or by any other applicable regulations or agreements.

Paragraph 11 Policy on taking over projects from other certification bodies

Article 21

This article describes the general policy of CU in case a project which was already inspected and/or certified by another certification body applies at Control Union.

On the CU application form the operator needs to indicate in case his project was earlier already inspected and/or certified by another certification body.

If such information is indicated on the application form, the CU certifier and/or program manager contacts the previous certification body in writing:

- informing, that CU will evaluate the farmers/units
- asking for the last issued certificates, reports, non-conformities, farmers lists and any other relevant information.

When receiving the information, CU will evaluate them with special attention on any open non-conformities.

All open conditions or non-conformities given by the previous certification body shall be evaluated and closed before CU can make a positive certification decision.

Regardless of the information received, Control Union will always carry out its own full physical audit against the applicable standard. The information received from the preceding certification body will never replace our own full evaluation of the project.

The CU certifier will decide on the status of the project based on the findings of the CU auditor and according to the CU procedures.

He will never deviate from the CU procedures or change the type or the possible deadline of any non-conformity to bring his decision in line with the previous certification body's decision.

Chapter 2 Additional requirements for different certification programs

Paragraph 1.

Additional rules for the certification programs Organic Production Methods (EU, USDA, JAS), and Global Organic Textile Standard (GOTS), Organic Exchange Blended and 100 standards, Global Recycle Standard (GRS)

Article 5a Subject of evaluation

1. Lapsed
2. Moved to paragraph 3.
3. Lapsed

Article 6 Samples

In case the result of any sample analyses for the organic programs EU and JAS shows residues of disallowed materials in any amount above the detection level of the laboratory, the following procedure applies:

CU immediately starts an investigation. Dependent on the nature of the residue that has been found, the whole chain of custody from the producer till the point where the residue has been found may be subject of the investigation. The CU client receives a standard Incident Report Form from CU, in which the representative of the client is requested to describe the possible reasons of the disallowed material detection. The information supplied by the client in this document is an essential part of the investigation. Furthermore, the CU client is requested to inform his buyers about the found residue. CU has the right to suspend the concerned product/unit and to stop issuing import and transaction certificates during the period of investigation and/or to carry out unannounced visits at the project. The result of the investigation may cause changes in the certification status of the product and/or units.

According to §205.671 of the National Organic Program of the United States: in case the result of any sample analyses shows prohibited substances at levels that are greater than 5 percent of the Environmental Protection Agency's tolerance for the specific residue detected or unavoidable residual environmental contamination, the agricultural product must not be sold, labeled, or represented as organically produced. CU will conduct an investigation according the above procedure to determine the cause of the prohibited substance.

Article 10 Classification of non-conformities

1. Lapsed

2.1 Non-conformities are classified as Minors and Majors:

- a. A minor (also called as 'condition') is a non-conformity, related to working procedures of the concerned unit. The maximum deadline to rectify a condition is 2 months. If the client does not correct and does not show to the satisfaction of CU, that the condition is rectified before the deadline, CU shall grant a major with a maximum deadline of 1 month.
- b. A major (also called as 'pre-condition') is a non-conformity, related to topics that endanger the status of the certified products coming from the concerned unit. The maximum deadline to rectify a major is 1 month. If the operator does not correct and does not show to the satisfaction of CU, that the major is rectified before the deadline, the certificate is suspended for a given period determined by CU on a case by case basis. In case the NC is not corrected during the suspension period, certificate shall be withdrawn.

In case of any non-conformity follow-up is needed. It is the responsibility of the client to take appropriate remedial actions. Whenever there is an outstanding NC, positive certification decision can not be made and certificate can not be issued for the concerned units/products.

Re-assessment can be done during an additional inspection or by administrative review (assessing documents, photos etc.).

During suspension, the product concerned can not be sold with reference to the organic production method and CU can not issue any import/transaction certificate for the given products/units.

In case the certification is withdrawn, the project needs to be re-inspected. All aspects of the standard need to be assessed during a new physical inspection.

2.2 Lapsed

Article 14 Import and transaction certificates

1. CU clients that holds a scope certificate for the certification program 'Organic Production Methods EU 834/2007 and 889/2008' can apply for import certificates when exporting a specific lot of certified products into the European Union.
2. CU clients that are certified for the certification programs 'Organic Production Methods EU 834/2007 and 889/2008' and/or 'USDA/ NOP' and/or 'JAS' and/or 'GOTS' have the right to apply for transaction certificates for a specific lot of certified products. When the certificate concerns a lot of textile products, these products have to be processed by the client.

3. Transaction and import certificates will be issued by qualified people from a CUC office.
4. Lapsed
5. The client shall request the application for transaction and import certificates by filling out the standardised application form and sending it with all the required documents attached to the *responsible* CU office. Requests can also be done using the client portal , reachable through the control union website.
6. CU shall assess the application and, if the assessment is positive, shall issue the transaction or import certificate within ten working days after receipt of the application.
7. The certificates contain a hologram.
8. Transaction certificates are obligatory for Organic Exchange Blended and 100 Standards. For GOTS, transaction certificates are also obligatory; not only up to the stage of the spinning mill.

Article 21 Production, storage and transport

1. Lapsed
2. Lapsed
3. The client shall conclude farmer agreements with all individual farmers within the project. The farmer agreement shall contain at least the information as mentioned in annex D. The farmer agreement shall be written in the local language or in any case in a language spoken by the farmer.
4. The client shall conclude processor agreements with all individual processors within the project. The processor agreement shall contain at least the information as mentioned in annex D. The processor agreement shall be written in the local language or in any case in a language spoken by the processor.
5. On request of the inspector, the client shall prove the gene technology free origin of all products and raw materials for which gene technology is prohibited according to the applicable regulations by means of a declaration free of genetic modification. The declaration free of genetic modification shall contain at least the information as mentioned in annex E.
6. Lapsed
7. For each lot of products, for which an import or transaction certificate is issued, the client shall have a representative and sealed sample kept present for half a year.
8. The client shall conclude field officer agreements with all individual field officers within the project. The field officer agreement shall contain at least the information as mentioned in annex D. The field officer agreement shall be written in the local language or in any case in a language spoken by the field officer.

Article 22 Product specification form and system plans

1. In case of application for adding to the scope certificate new products produced in certified units, the client shall apply in writing prior to produce, process and/or selling the product with reference to the certification. Application shall be done by filling out the Application form (available at <http://certification.controlunion.com> or by request from any CU office). In case of application for adding a product the client shall send CU a completed standardised product specification form (available at <http://certification.controlunion.com> or by request from any CU office). Production/processing specification forms (system plans) shall be adopted by the client, if applicable.
2. CU shall evaluate the application forms and/or specification forms (system plans) within ten working days after receipt.
3. CU shall add products to scope certificates only after a positive evaluation of the product specification. In the event of initial certification, the first inspection has to be carried out before the products can be mentioned on the certificate.
4. In case of application for adding new units to the scope certificate, the client shall apply in writing prior the production and/or processing of the product to be certified. Application shall be done by filling out the Application form (available at <http://certification.controlunion.com> or by request from any CU office). Production/processing description forms (system plans) shall be adopted by the client.
5. CU shall add units to scope certificates only after a positive site evaluation of the production/processing.
6. **Please note, that CU clients are obliged to inform CU in case the products and/or units under the CU scope are also certified by another certification organisation against the same standard (or applied for certification to another certification organisation).**
Furthermore, please note, that where an operator and his subcontractors are inspected by different control bodies the operator and his subcontractors have to agree, that the different control bodies can exchange information on the operations under their control.

Article 23 Smallholder farmer groups

1. For smallholder farmer groups additional requirements are applicable as laid down in the document "Inspection of smallholder farmer groups: Internal Control System", as described in annex F of this document.

Article 24 Interpretations

1. **All interpretations as made by CU on Regulation (EEC) No. 834/2007 and 889/2008 and described in annex G from this document shall be used and**

followed by the client in all situations in which the article that interpretation regards, is applicable.

2. Globalgap : National Interpretation Guidelines. Gives clarification and adaptation of the CPCC to the relevant country. Only available for countries where approved by the respective Sector Committees. These become obligatory for use as soon as they are approved and published.

Article 25 Administration

1. Lapsed

2. The client shall keep records of the following information on certified incoming goods:
 - Copies of packing lists and/or other transport documents;
 - Invoices;
 - Copy of valid certificates stating that the products have been produced according to the applicable organic regulation;

For not CU certified products:

- a copy of the valid accreditation certificate that is issued to the certification body, which certified the product in question:
- i) For the certification of organic product in conformity with the Regulation (EEC) No. 834/2007 and 889/2008:
 - the accreditation certificate shall be on EN 45011 / ISO/IEC Guide 65
 - address of unit, where the product was produced, processed
 - indication whether the unit is a farm unit or a processing unit
 - date of first inspection per unit
 - starting date of conversion period per unit
 - total period of conversion applied per unit
 - date of last inspection per unit
 - size organic/conventional land per unit
 - in case of grower group, indication whether it is a co-operative or a contract growers
 - number of farmers externally inspected in the previous calendar year
 - number of small scale farmers at the date of last inspection and
 - number of small scale farmers externally inspected at the date of last inspection is required.
 - ii) For the certification of organic product in conformity with the USDA/NOP rule: the accreditation certificate shall be issued by USDA stating that the certification body is authorised to carry out inspection and certification according to the NOP rule.
 - iii) for the certification of organic product in conformity with the JAS rule: the accreditation certificate shall be issued by the Japanese Ministry stating that the

certification body is authorized to carry out inspection and certification according to the JAS rule

iv) **lapsed**

The invoices and transaction documents must contain a reference to the organic production method, clearly related to the certified products, and the name and identification code of the inspection body.

3. a) The client shall keep records of the following information on outgoing certified products:
 - Copies from packing lists and/or other transport documents;
 - Copies of the CU transaction or import certificates, and Invoices.The invoices and transport documents must contain a reference to the organic production method, clearly related to the certified products, and CU followed by the client number.
- b) The client shall have on all labels, invoices, packing-lists and transport-documents a traceable identification code which enables to identify production date/year and lot number to trace down the product at least to the last producer and preferably to the individual farmer or farmer group.

Article 26 On-and-off product statements

1. The client is responsible that all on- and off product statements for certified products that are transported between units within the same project, contain at least the following information:
 - The name of the product;
 - The name "CU", followed by the client number;
 - A reference to the organic production methods, and
 - A traceable identification code referring to the specific lot of products (e.g. lot number, date of production).
2. The client is responsible that all on- and off product statements for certified products that are transported to units outside the project, contain at least the following information
 - The name of the product
 - The clients name and address (city and country);
 - The name "CU", followed by the client number;
 - A reference to the organic production methods,
 - A traceable identification code referring to the specific lot of products (e.g. lot number, date of production).
3. The client is responsible that all logo use is according the provisions described in:

- for the EU organic program: EU 834/2007 and 889/2008. Annex V. (Community logo)
- for the USDA/NOP program: the National Organic Program (USDA logo)
- for the JAS program: Annex I. of this regulation (JAS logo)
- for GOTS: Article 30 of this Regulation and Annex J
- for Organic Exchange: Annex N
- for Global Recycle Standard: Annex O

Article 51 Retrospective consideration of the conversion period

With conversion of parcels where, it has been proven to the satisfaction of CU, that no products have been used in the past which are not permitted, the conversion period can be retrospectively considered by CU.

Proof of no use of disallowed materials can be sufficient land history documentation (proof of producing according to the requirements in last 2-3 years (depends on the length of conversion period)) issued by an independent third party. Emphasis shall be placed on the authenticity of the declarations and that as many details and specifications as possible together with exact dates, signature and stamp shall be available.

Only if a project is inspected from the start of the growing season will it be possible to sell products with organic (or 100% organic) status in the first year of inspection. This means that physical inspection of the whole growing season of the product is needed before selling a product as organic (or 100% organic).

Furthermore, CU demands that, before she takes a decision about the retrospective consideration of the conversion period, samples are being analysed for residues of disallowed products at the expense of client.

Extension of the conversion period

CU reserves the right to decide to extend the conversion period, in case the soil has been chemically polluted in such quantities that this can lead to residues in the finished product (plants or animals).

Procedural

Should one of the above situations be applicable, then CU will decide to retrospectively consider or extend the conversion period according to this interpretation.

Article 52 Additional for JAS program

Lapsed

Article 53 Additional for NOP program

In accordance with the NOP regulation CU has the right to make the following information on NOP clients available to any member of the public upon request:

- (i) Certification certificates issued by CU during the current and 3 preceding calendar years;
- (ii) A list of producers and handlers whose operations have been certified by CU, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years;
- (iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years; and
- (iv) Other business information as permitted in writing by the producer or handler

Article 54 Lapsed

Paragraph 3. Additional rules for the certification program GOTS, Organic Exchange Blended and 100 standards

In addition to chapter one, the following articles from the rules for Organic production apply:

Articles : 5a, 6, 10, 14, 21, 22, 25

Furthermore, the following articles apply:

Article 27 Processing, storage and transport

- 1. Lapsed
- 2. Lapsed
- 3. Dyes have to be approved by a GOTS-approved certification body in writing, before using them. This written approval has to be kept in licensee's administration as long as the specific dye is used and must be available for the CU inspector's perusal. The criteria on which the judgment is made are given in the Standards for GOTS. Any other auxiliaries that are used in the dyeing process and which are not mentioned in the standards have to be approved in writing by a GOTS-approved certification body. The written approval has to be kept in the licensee's administration as long as the specific auxiliary is used and must be available for the CU inspector's perusal. The judgment by CU is based on the information that the licensee provides to CU. The information may come from lab results (provided the tests are carried out according to the testing methods that are described in these standards). It may also come from the information that the producer of the substance must provide to their customer. At random inspections will take place by CU, by testing a swatch of fabric (the testing will be subcontracted to a laboratory). For this, the licensee has to provide the inspector

with swatches, on demand. The swatches will be tested on the following: heavy metals content of the fabric, formaldehyde content and the presents of AZO dyes. This testing will be carried out according to the methods that are given in the GOTS regulation.

Article 28 Administration

1. Lapsed
2. See article 27.3
3. During inspection, clients must use dyes and/or processing aids permitted by CU – through the GOTS , or by approval of specific dyes/processing aids. This may be done in two ways: 1 – clients must show proof of CU approval from the producer of the dye/processing aid, or 2 – clients must show proof that the client has obtained permission by CU to use the specific dye/processing aid. When in doubt CU staff may consult the internal database.

Article 29 Incoming materials from other certification bodies

1. For GOTS, all incoming goods used by the client in the certified production process have to be certified according to GOTS, by a GOTS recognized certification company. Only for natural fibers CU can make an exception on this rule.
 - a) For approval CU needs to assess the following documents provided by the client:
 - the applicable standards;
 - the inspection report for the applicable lot (on request);
 - a) the original transaction certificate;
 - b) a copy of the scope certificate of processing unit, and
 - c) a copy of the valid accreditation certificate on EN 45011 / ISO/IEC Guide 65 for the applicable organic standard, that is issued to the certification body.
 - b) For certain inspection bodies parts of this information is already available and assessed at CU.
 - c) Products will only be accepted if further processing under CU certification takes place.
 - d) The GOTS logo is also valid for all products that are certified by CU according to the Global Organic Textile Standard (GOTS), provided that it mentions on the indications that the product has been certified by Control Union Certifications according to the Global Organic Textile Standard and in the GOTS logo use requirements..
2. For OE blended and OE 100, all incoming goods used by the client in the certified production process have to be certified according to OE Blended, resp. OE 1000 standards, by an Organic Exchange recognized certification company. Organic raw material fiber shall be certified as organic according to one of the following certification schemes:
 - Regulation (EEC) No. 834/2007 and 889/2008.

- National Organic Program of the United States Department of Agriculture
- IFOAM

The raw material shall be certified by a certification agency that is accredited according to ISO 65 / EN 45011 (for Regulation (EEC) No. 834/2007 and 889/2008), IFOAM (for IFOAM certified raw material) or recognized by the USDA (for NOP)

- a) For approval CU needs to assess the following documents provided by the client:
 - the applicable standards;
 - the inspection report for the applicable lot (on request);
 - a) the original transaction certificate;
 - b) a copy of the scope certificate of processing unit, and
 - c) a copy of the valid accreditation certificate on EN 45011 / ISO/IEC Guide 65 or USDA recognition proof, for the applicable organic standard, that is issued to the certification body.
- b) For certain inspection bodies parts of this information is already available and assessed at CU.
- c) Products will only be accepted if further processing under CU certification takes place.

Article 30 On-and-off product statements specifically for Global Organic Textile Standards, Organic Exchange

The client is responsible that all on- and off product statements for certified half-finished products that are transported to units outside the project, contain at least the following information:

- The name of the product;
- The name "CU", followed by the client number;
- The clients name and address (city and country);
- An indication that refers to the name of the applicable standard
- A traceable identification code referring to the specific lot of products (e.g. lot number, date of production).

The client is responsible that all on- and off product statements for consumer products contain at least the following information:

- The name "CU" followed by the client number;
- The clients name and address (city and country); and
- An indication that refers to the applicable standard.

3. Lapsed.
4. Moved to Annex J.
5. For GOTS logo use: Moved to annex J.
6. For further information about the GOTS labeling, see Annex J and the GOTS logo use requirements document. For logo use of the Organic Exchange, see Annex N..

Paragraph 4., 5., 6. Lapsed

Paragraph 7. Additional rules for the certification program ISO 9001:2000

Article 31. Audit types:

- Initial audit:

First ever audit of a client. Initial audit is none if the client has never been certified for ISO9001 by CU or by any other company. The initial audit start with a stage 1 audit/document review which can be done on site also and continues in a stage 2 audit/site visit. The stage 2 audit is always an on-site audit.

- Re-certification audit (re-assessment or re-evaluation):

Done in every 3 years after the initial audit or the first time if the client has already certified. The re-assessment consists of stage 1 audit/document review and a stage 2 audit/site visit. The stage 1 audit can be , but the stage 2 audit is always an on-site audit.

- Surveillance audit:

Yearly follow-up audits between the initial and re-assessment audits. The surveillance audit has no separate stage 1 and 2 part. The surveillance audit is always an on-site audit.

In addition the above audit CU can perform special audits.

- Extensions to scope

CU will in response to an application for extension to the scope of a certification already granted, undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit.

- Short-notice audits

CU reserves the right to conduct short notice audit. These audit announced to the client 1 day before the actual visit takes place. The client can object against the audit team members but cannot object against the audit. The reasons for these short notice audits can be doubts derived from complaints, external notices or information, internal information gathered during previous audits or as follow up on suspended clients.

- Re-assessment of non-conformities

Some nonconformities (or group of nonconformities) may need to be re-assessed by additional site visit. The auditor in consultation with the auditee decide when it is necessary. The certifier can overrule this decision but the client must be informed.

Article 32. Classification of non-conformities

The ISO9001 scheme has 2 NC-types:

NC-type	Description	Deadline
Major	The absence of, or the ineffective implementation of, one or more required system elements, or a situation which raises significant doubt that products or services	1 month; verification necessary.

	will meet the specified requirements. A major non-conformity can also be a group of minor non-conformities indicating inadequate implementation of the system relevant to an element of the standard.	
Minor	A lapse or either discipline or control during the implementation of the system / procedural requirements, which does not indicate a system breakdown or raise doubt that the products or services will meet the requirements.	3 months; verification might be done during next audit.

Critical observations	Points not classified as non-conformity during the audit but will be assessed in the next audit.
Recommendation	Aspect that improves the quality management system.

Article 33. Sanction and condition of granting certification

Type of non-compliance	Company action and corrective action	Action by CU
Major NC	Undertake and confirm corrective action to CU within 1 month.	<p>If more Major NCs found making obvious the fundamental deficiencies of the system CU will revisit the company and carry out a full assessment.</p> <p>Initial certification Certificate cannot be granted unless compliance is demonstrated with or without a further revisit. If the corrections submitted later than 3 months a complete new audit will take place.</p> <p>Re-certification New certification cannot be granted unless compliance is demonstrated with or without a further revisit. Undertake and confirm corrective action to CU within 1 month.</p> <p>Suspension of the certificate if NC is not closed within a month.</p> <p>Surveillance audits Undertake and confirm corrective action to the certification body within 1 month.</p> <p>Suspension of the certificate if NC is not closed within a month.</p>
Minor NC	Undertake and confirm corrective action to CU within 3 months,	<p>Initial certification Certification cannot be granted unless compliance is demonstrated with or without a further revisit. If the corrections submitted later than 3 months a complete new audit will</p>

		<p>take place.</p> <p>Re-certification New certification cannot be granted unless compliance is demonstrated with or without a further revisit. Undertake and confirm corrective action to the certification body within 3 month.</p> <p>Suspension of the certificate if NC is not closed within 3 month.</p> <p>Surveillance audits Undertake and confirm corrective action to the certification body within 3 month. Suspension of the certificate if NC is not closed within 3 month. Absolute verification of corrective action can be carried out at subsequent evaluation.</p>
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Article 34. Guideline for closing a nonconformity

The client need analyze the cause and describe the specific correction and corrective action taken, or planned to be taken, to eliminate detected nonconformity before the above mentioned deadline.

- **Corrective action:** you need to investigate the nonconformity, determine the root cause of the problem and implement some form of corrective action to prevent the problem re-occurring.
- **Correction:** an immediate action to solve the problem without preventing it re-occurring, a 'quick-fix' dealing only with the symptom.

Only when the client is sure that the problem has been solved he/she should submit details of the corrective action along with the evidence of the effectiveness of the solution and the correction:

To do this in the right way the client should ask the following questions:

- Is the root cause of the problem identified.
- Was the problem localised or could it have more far-reaching implications and are necessary steps taken the to ensure that the corrective action has been applied through the system where such problems could also occur .
- Has the system been revised so that a permanent fix has been put in place, not just for the immediate future, but on a more long term basis.

Submitting only a correction is not enough to close a nonconformity.

In your response you need to detail at least the following:

- Explanation of the cause of the failure including root cause.
- Description of measures that has been taken to avoid the reoccurrence of the

problem.

- Send evidence that the measures has been implemented.

Article 35. Possible certification decisions of the Certifier

Initial certification

Initial certification is when CU certifies the project at the first time. It can be result of an initial audit (when the client has not been certified before) or of a re-certification audit (when the client has already been certified by some other CB). If the decision is positive a certificate is issued for 3 years. The certificate cannot be issued until it is demonstrated that the client satisfies all the requirements of the ISO9001 quality management system standard.

Re-certification

After the 3 year audit program is over, there must be a re-certification audit done. Re-certification audit is a complete audit which is reported in the Audit Report. The Certifier shall make decisions on renewing certification based on the results of the recertification audit, as well as the results of the review of the system over the period of certification and complaints received from users of certification. If the decision is positive a new certificate is issued for another 3 years.

Maintaining certification (continued certification)

In the frame of the 3 year audit program, between the initial and the re-certification audit and certification CU must do annual surveillance audits. After each surveillance audit the Auditor reports to the Certifier. The Certifier shall maintain certification based on demonstration that the client continues to satisfy the requirements of the ISO9001 quality management system standard.

Suspension

The certification is suspended in cases when, for example:

- the client's certified management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management system;
- the certified client does not allow surveillance or recertification audits to be conducted at the required frequencies; or
- the certified client has voluntarily requested a suspension;
- certification fee has not been paid;
- non-conformities have not been closed before the deadline;
- failure to comply with other contractual requirements including using the CU ISO9001 certification mark e.g.: CU ISO9001 logo.

Under suspension, the client's management system certification is temporarily invalid. The suspended status of the certification shall be indicated on the publicly accessible client list.

Withdrawal

Suspension can be held for a maximum 6 months. Failure to resolve the issues that have resulted in the suspension within 6 months shall result in withdrawal or reduction of the scope of certification.

Extension / reduction of the scope of certification.

The Certifier shall, in response to an application for extension to the scope of a certification already granted, undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit. After the audit with positive result a new certificate -updated with the extended scope - should be issued, but the validity should be the same as on the original certificate.

Reduction of the scope can be indicated by the client or can be a consequence of the audit result. For example, reduction of the scope can be applied if a non-conformity affecting only a clearly determined part of the scope cannot be solved by the company, but QMS is functioning well for the rest of the scope. The Certifier must consider whether the certificate need to be suspended/cannot be granted or the scope of the certificate need to be reduced.

Paragraph 8. Additional rules for the FSC Forestry Certification Program

Article 36. Audit types:

- Pre-assessment, pre-evaluation or scoping:

Short visits carried out by qualified lead auditor or small audit team, prior to a main evaluation. Pre-evaluation visits allows Control Union to familiarize the client with the main requirements of the standard to be used for the audit, and to ensure that there are no obvious problems that the client should work to correct before committing to the cost of a full evaluation. It also familiarizes Control Union with the client and with major forest stewardship issues in the region. They allow Control Union to carry out preparation for the main evaluation including the identification of stakeholders, preparation of logistics and collection of essential background information such as management plans and maps. A pre-evaluation is a requirement prior to the main evaluation in case of large scale forests for which the total area included in the scope of evaluation (either as a single Forest Management Unit or as a collection or group of separate Forest Management Units) is greater than 10 000 hectares, unless the whole area meets the requirements for classification as a low intensity managed forest (SLIMF), as well as in cases of High Conservation Value Forests (HCVF).

- Initial audit, main assessment or main evaluation:

First ever audit of a client, which may result in the issuance of a certificate. The initial audit consists of a document review and site visits.

- Re-certification audit (re-assessment or re-evaluation):

Carried out at the end of the certification cycle (maximum 5 years after issuance of certificate). The re-assessment consists of a document review and site visits.

- Surveillance audit:

Yearly follow-up audits between the initial and re-assessment audits.

In addition the above audit CU can perform special audits.

- Extensions to scope

CU will in response to an application for extension to the scope of a certification already granted, undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit.

- Short-notice audits

CU reserves the right to conduct short notice audit. These audits will be announced to the client 1 day before the actual visit takes place. The client can object against the audit team members but cannot object against the audit. The reasons for these short notice audits can be severe doubts derived from complaints, external notices or information, internal information gathered during previous audits or as follow up on suspended clients.

- Re-assessment of non-conformities

Some nonconformities (or group of nonconformities) may need to be re-assessed by additional site visit. The auditor in consultation with the client or auditee decide when it is necessary. The certifier can overrule this decision but the client must be informed.

Article 37. Classification of non-conformities

The FSC Forestry Certification Program has 2 NC-types:

NC-type	Description	Deadline
Major	<p>A non-compliance shall be considered major if, either alone or in combination with further non-compliances, it results in, or is likely to result in a fundamental failure to achieve the objective of the relevant requirement in the Chain of Custody operation(s) within the scope of the evaluation. Such fundamental failure shall be indicated by non-compliance(s) which:</p> <ul style="list-style-type: none"> a) continue over a long period of time, <i>or</i> b) are repeated or systematic², <i>or</i> c) affect a wide range of the production, <i>or</i> d) are not corrected or adequately responded to by the responsible managers once they have been identified. 	<p>3 months (under exceptional circumstances six (6) months); verification necessary.</p>
Minor	<p>A non-compliance may be considered minor if:</p> <ul style="list-style-type: none"> a) it is a temporary lapse, <i>or</i> b) it is unusual/non-systematic, <i>or</i> c) the impacts of the non-compliance are limited in their temporal and organizational scale, <i>and</i> d) it does not result in a fundamental failure to achieve the objective of the relevant requirement. 	<p>1 year (under exceptional circumstances 2 years); verification might be done during next audit, but can also take place as a desk re-assessment in case CUC considers this to be possible.</p>
Observations	Points not classified as non-conformity during the audit but will be assessed in the next audit.	

Article 38. Sanction and condition of granting certification

Type of non-compliance	Company action and corrective action	Action by CUC
Major NC	Undertake and confirm corrective action to CUC within 3 months (under exceptional circumstances six (6) months).	<p>Initial certification Certificate cannot be granted unless compliance is demonstrated with or without a further revisit. If the corrections are submitted later than 3 months a complete new audit will have to take place.</p> <p>Re-certification New certification cannot be granted unless compliance is demonstrated with or without a further revisit. Undertake and confirm corrective action to CUC within 3 months. Suspension of the certificate if NC is not closed within 3 months.</p> <p>Surveillance audits Undertake and confirm corrective action to the certification body within 3 months (under exceptional circumstances 6 months). More than 4 major NC's identified during an audit automatically means suspension of the certificate (only FSC CoC). Suspension of the certificate if NC is not closed within this timeframe.</p>
Minor NC	Undertake and confirm corrective action to CUC within 1 year (under exceptional circumstances 2 years)	<p>Initial certification Certification can be granted. Undertake and confirm corrective action to the certification body within the given timeframe (usually 1 year). NC will be upgraded into major if NC is not closed within the given timeframe</p> <p>Re-certification New certification can be granted. Undertake and confirm corrective action to the certification body within the given timeframe. NC will be upgraded into major if NC is not closed within the given timeframe</p> <p>Surveillance audits Undertake and confirm corrective action to the certification body within the given timeframe. NC will be upgraded into major if NC is not closed within the given timeframe.</p>

Article 39. Guideline for closing a nonconformity

The client shall analyze the cause and describe the specific correction and corrective action taken, or planned to be taken, to eliminate detected nonconformity before the above mentioned deadline.

The following shall be taken into account:

- Corrective action: you need to investigate the nonconformity, determine the root cause of the problem and implement some form of corrective action to prevent the problem re-occurring.
- Correction: an immediate action to solve the problem without preventing it re-occurring, a 'quick-fix' dealing only with the symptom.

Only when the client is sure that the problem has been solved he/she should submit details of the corrective action along with the evidence of the effectiveness of the solution and the correction to CUC:

To do this in the right way the client should ask the following questions:

- Is the root cause of the problem identified.
- Was the problem localised or could it have more far-reaching implications and are necessary steps taken to ensure that the corrective action has been applied through the system where such problems could also occur .
- Has the system been revised so that a permanent fix has been put in place, not just for the immediate future, but on a more long term basis.

Submitting only a correction is not enough to close a nonconformity, unless this is explicitly mentioned in the NC.

In your response you need to detail at least the following:

- Explanation of the cause of the failure including root cause.
- Description of measures that has been taken to avoid the reoccurrence of the problem.
- Send evidence that the measures has been implemented.

Article 40. Possible certification decisions of the Certifier

Initial certification

Initial certification is when CUC certifies the project at the first time. It can be the result of an initial audit (when the client has not been certified before) or of a re-certification audit (when the client has already been certified by some other CB). If the decision is positive a certificate is issued for a maximum of 5 years. The certificate cannot be issued until it is demonstrated that the client satisfies all the FSC requirements.

Re-certification

After a maximum of 5 years audit program, there must be a re-certification audit done. Re-certification audit is a complete audit which is reported in the Audit Report. The Certifier shall make decisions on renewing certification based on the results of the recertification audit, as well as the results of the review of the system over the period of certification and complaints received from users of certification. If the decision is positive a new certificate is issued for another 5 years (maximum).

Maintaining certification (continued certification)

In the frame of the 5 year audit program, between the initial and the re-certification audit and certification CUC must carry out annual surveillance audits. After each surveillance audit the Auditor reports to the Certifier. The Certifier shall maintain certification based on demonstration that the client continues to satisfy the FSC requirements.

Suspension

The certification is suspended in cases when, for example:

- the client's certified management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management system;
- the certified client does not allow surveillance or recertification audits to be conducted at the required frequencies; or
- the certified client has voluntarily requested a suspension;
- certification fee has not been paid;
- major non-conformities have not been closed before the deadline;
- failure to comply with other contractual requirements.

Under suspension, the client's management system certification is temporarily invalid. FSC shall be informed by CUC through putting the certification status on suspended on the FSC database.

Withdrawal

Suspension can be held for a maximum 6 months. Failure to resolve the issues that have resulted in the suspension within 6 months shall result in withdrawal.

In case the certificate has been suspended or withdrawn CUC issues a letter of notification to the company.

In the event that a certificate is suspended or withdrawn, the client shall:

- a) immediately cease to make any use of any FSC trademarks, or to sell any products that the client has previously labeled or marked using the FSC trademarks, or to make any claims that imply that they comply with the requirements for certification;
- b) identify all relevant existing customers, and advise those customers of the suspension or withdrawal in writing within three (3) business days of the suspension or withdrawal, and maintain records of that advice;
- c) cooperate with CUC and with FSC in order to allow CUC or FSC to confirm that these obligations have been met.

On withdrawal of the certificate the client shall:

- a) return the certificate to the certification body or destroy the original, and commit to destroy any electronic copies and hardcopies in their possession;
- b) at its own expense remove all uses of FSC's name, initials, logo, certification mark or trademarks from its products, documents, advertising or marketing materials.

Extension / reduction of the scope of certification,

The Certifier shall, in response to an application for extension to the scope of a certification already granted, undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit. After the audit with positive result a new certificate -updated with the extended scope - should be issued, but the validity should be the same as on the original certificate.

Reduction of the scope can be indicated by the client or can be a consequence of the audit result. For example, reduction of the scope can be applied if a non-conformity affecting only a clearly determined part of the scope cannot be solved by the company, but QMS is functioning well for the rest of the scope. The Certifier must consider whether the certificate need to be suspended/cannot be granted or the scope of the certificate need to be reduced.

ANNEXES

ANNEX A. Lapsed
ANNEX B. Lapsed
ANNEX C. Lapsed
ANNEX M. Lapsed

Applicable annexes: ANNEX D, E, F, G, H, I, J, K, L, M, N, O and P.

**ANNEX D. Agreements (applicable for organic production)
CU Farmer agreement**

Name client			
Address client			
Client number		Country	
Name field officer (if any)			
Name and number unit			
Name farmer			
Code/number farmer			
Address farmer			
<p>1. I as farmer declare that I understand the standards for organic agriculture of which the most important aspects are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> No use of disallowed substances like artificial fertilizer or chemicals (herbicides, pesticides, insecticides, fungicides) <input type="checkbox"/> Maintenance and improvement of soil-fertility by an appropriate crop rotation, use of animal excrements, green-manure and cultivation of legumes <input type="checkbox"/> Control pests and diseases by natural ways and control weeds by hand or mechanically <input type="checkbox"/> Use of organic propagation material <input type="checkbox"/> Avoid contamination of fields and products with disallowed substances. <input type="checkbox"/> Label the certified products correctly as organic or under conversion to organic. <p>2. I declare that I work on my fields included in the inspection-program and during the on-farm first processing of products, conform the above mentioned standards for organic production.</p> <p>3. I will allow CU inspectors access to all my fields and premises for inspection purposes and I will fully co-operate with them.</p> <p>4. Only if no farmer-group: I declare that</p> <ul style="list-style-type: none"> <input type="checkbox"/> Detailed map of the fields is maintained. <input type="checkbox"/> Adequate written <u>bookkeeping</u> of all incoming and outgoing products is available. <p>5. In case of non-compliance with the above-mentioned standards I will inform the above mentioned field officer and/or CU client, and I will not sell the products as organic or under conversion to organic. Also, I will inform in writing the buyers of the products in order to ensure that the indications referring to the organic production method are removed from the product in question.</p>			
Date and signature of farmer			
Date and signature of field officer (if any)			

CU Processor agreement

Name client			
Address client			
Client number		Country	
Name processor			
Address processor			
Number unit			
<p>1. I as farmer declare that I understand the standards for organic food-processing of which the most important aspects are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Separate storage of raw organic products, half-finished products and ready organic products avoiding mixing with non-organic products <input type="checkbox"/> Separate processing of organic products avoiding mixing with non-organic products <input type="checkbox"/> During processing and storage no disallowed substances, ingredients or technical aids are used and appropriate measures are taken to avoid contamination of organic products with these substances <input type="checkbox"/> Production will take place conform the process-specification and approved product-specifications. <input type="checkbox"/> Enable the identification of organic products during the whole process and in the storage. <input type="checkbox"/> Appropriate bookkeeping of all incoming, processed, stored and outgoing products is maintained. <p>2. I will allow CU inspectors access to all premises and information required for inspection purposes and I will fully co-operate with them.</p> <p>3. In case of non-compliance with the above-mentioned standards I will inform the CU client and I will not sell the products as organic or under conversion to organic. Also I will inform in writing the buyers of the products in order to ensure that the indications referring to the organic production method are removed from the product in question.</p>			
Date and signature of processor			
Date and signature of client			

CU Field officer agreement

Name client			
Address client			
Client number		Country	
Name field officer			
Address field officer			
Name and number unit			
<p>1. I as field officer declare that I understand the standards for organic agriculture of which the most important aspects are:</p> <p>No use of disallowed substances like artificial fertiliser or chemicals</p> <ul style="list-style-type: none"> q Maintenance and improvement of soil-fertility by an appropriate crop rotation, use of animal excrements, green manure and cultivation of legumes. q Control pests and diseases by natural ways and control weeds by hand or mechanically. q Use of organic propagation material. q Avoid contamination of fields and products with disallowed substances. q Label the certified products correctly as organic or under conversion to organic. <p>2. I will allow CU inspectors access to all premises and information required for inspection purposes and I will fully co-operate with them.</p> <p>3. I declare that:</p> <ul style="list-style-type: none"> q Adequate <u>annual internal checking/evaluation</u> of all farmers of this unit on the compliance with the above mentioned standards are performed. Adequate records of internal inspections are maintained. In instances of non-compliance with the standards appropriate steps are taken. q <u>Overview-map</u> of the area and <u>detailed maps</u> per farmer are maintained. q All farmers of this unit are included in the inspection-program have understood and signed the <u>farmer agreements</u> and they are informed on the above mentioned standards and are assisted to comply with them. q Adequate written <u>bookkeeping</u> of all products purchased from the farmers and sold to the above-mentioned CU client is available. q <u>Basic data</u> of all farmers is maintained containing at least identification, name, year of conversion, location, number or hectares, last internal evaluation and last CU inspection and yields records. <p>4. In case of non-compliance with the above-mentioned standards I will inform the CU client and I will not sell the products as organic or under conversion to organic. Also I will inform in writing the buyers of the products in order to ensure that the indications referring to the organic production method are removed from the product in question.</p>			
Date/signature of field officer			
Date/signature of client			

ANNEX E. Declaration free of genetic modification (for organic production)

Vendor declaration according to Article 9(3) of Council Regulation (EC) No 834/2007	
Name, address of vendor:	
Identification (e.g. lot or stock number):	Product name:
Components: (Specify all components existing in the product/used the last in the production process)	
<p>I declare that this product was manufactured neither 'from' nor 'by' GMOs as those terms are used in Articles 2 and 9 of Council Regulation (EC) No 834/2007. I do not have any information which could suggest that this statement is inaccurate.</p> <p>Thus, I declare that the above named product complies with Article 9 of Regulation (EC) No 834/2007 regarding the prohibition on the use of GMOs.</p> <p>I undertake to inform our customer and its control body/authority immediately if this declaration is withdrawn or modified, or if any information comes to light which would undermine its accuracy. I authorise the control body or control authority, as defined in Article 2 of Council Regulation (EC) No 834/2007, which supervises our customer to examine the accuracy of this declaration and if necessary to take samples for analytic proof. I also accept that this task may be carried out by an independent institution which has been appointed in writing by the control body. The undersigned takes responsibility for the accuracy of this declaration.</p>	
Country, place, date, signature of vendor:	Company stamp of vendor (if appropriate):

ANNEX F. Inspection of smallholder farmer groups¹ (for organic production)

1. Introduction

The inspection of smallholder farmer groups consisting of ten to hundreds of farmers poses a severe challenge to the inspection body and their inspector. The employment of an internal control system (ICS) will give a practical procedure, which keeps the inspection costs at an acceptable level.

This document gives a guideline for the internal control system of smallholder farmer groups.

2. Farmer group

2.1.1 The farmer group should consist of a clear and homogeneous group of members with regard to their agricultural production and first processing system and the geographical, social and economical aspects.

2.2 A substantial part of the inspection work is carried out by internal inspectors in the framework of the internal control system (ICS) set up by the group. Members of the farmer group are inspected at least once a year internally by internal inspectors employed by an organization responsible for the Internal Control System (ICS) and randomly by CU. Internal inspections include visits to fields and facilities.

2.3. In principle only small farmers can be members of the group. Larger farms - bearing an external certification cost that is lower than 2% of their turnover – can also belong to the group, but has to be inspected annually by CU. Processors and exporters can be part of the structure of the group, but have to be inspected annually by CU.

2.4 A group may be organized in itself (as a co-operative or as a structured group of producers affiliated to a processor or an exporter).

¹ Document partly based on document “Kontrolle von Kleinerzueger-Zusammenschlüssen in Drittländern (i.S. von Basis-/Primärgenossenschaften)” (31.03.1999) of the German authorities and IFOAM.

A group must be established formally, based on individual farmer agreements – signed by all members of the group - as specified in the Annex D. Minor changes and extension of the content are acceptable.

The farmer agreement and standards should be available in a language understandable for the farmer.

The members should have access to and knowledge of the applicable standards for organic production.

The group shall have central management, established decision procedures and legal capacity.

- 2.5 When intended for export, the marketing of the products must be carried out as a group.

3. Internal Control System (ICS)

- 3.1 Of the organisation in charge of the internal control system, also referred to as internal inspection body, the following information is available:

- § Legal status, structure, liability of organisation responsible for the ICS
- § Authorisation for countersigning inspection-forms
- § Rights and obligations of group-members as laid down in written farmer agreements

- 3.2 The internal control and quality system is clearly documented in writing including among other things procedures, standardised inspection-forms (for example by using a visit-book), responsibilities and timeframes.

Clear procedures indicating actions to be taken in instances of non-compliance with standards, sanctions and exclusion of members. CU has to be informed in case of irregularities and non-compliances, as well as of the corrective actions imposed with agreed time for completion.

100% of all farms and fields of the group members have to be inspected by the internal inspector once a year.

Quarterly the findings of the internal control and measures taken will have to be summarized in writing.

3.3 The following up-to-date documentation has to be available for the farmer group:

- § Farmer-lists with names, identification codes, location, status (organic, in conversion first or second year or disqualified), crops and hectares
- § Signed farmer agreements for each member
- § Administration of sold products, stored products and bought agricultural inputs of each member
- § Overview realised yield of last year and estimated yield of current year per product
- § Overview map and detailed farm-maps indicating individual fields per member and information on possible contamination risks from neighboring fields
- § Field-history for each member with regard to the used fertilisers and plant-protection substances (including herbicides, fungicides, pesticides, etc)

3.3 Seasonal adequate sampling on residues of sold products should be performed and results of analysis must be available. Sub-samples per member can be mixed and analysed as a mixed sample.

3.4 Internal inspectors are designated by the group and carry out internal controls. They must receive suitable training, have to be qualified and independent. The field officers can not be member of the farmer group. A signed field officers agreement specifying tasks and responsibilities should be present (see annex D as an example).

3.5 Not the individual members but the group holds the contracts with CU. This organisation has the final responsibility that their members comply with the standards for organic production and first processing and that the instructions given are executed.

3.6 In case an individual member has not converted his whole farm into organic production, guarantees must be given with regard to separation (for example separate storage facilities of agricultural products and inputs).

4. External inspection

4.1 CU verifies, evaluates and reports all aspects (with special focus on the effectiveness) of the internal control system. Findings of the ICS will be cross-checked. Based on the results of this inspection the inspection body will certify the farmer groups.

4.2 CU carries out at least one annual inspection of the group.

The yearly inspection by CU shall include an inspection visit of a number of individual farms with the aim to inspect for compliance with the standards and to evaluate the effectiveness of the ICS.

4.2.1 Each year CU defines and justifies a risk-orientated sample of farms subject to its annual inspections.

For a normal risk situation, it shall not be lower than the square root of the number of farmers in the group (but at least 10 members).

For medium risk situations CU will inspect at least 1,2 square root of the farmers in the group (but at least 12 members).

For high risk situations CU will inspect at least 1,4 square root of the farmers in the group (but at least 14 members).

CU defines for all of its group projects the applicable risk category by using its risk assessment document.

The farms visited by CU must be predominantly different from one year to another.

Larger farmers, processors and exporters are inspected annually by CU.

CU has a documented sanction policy for groups.

In case CU finds the ICS to seriously lack reliability and effectiveness, it will apply sanctions to the group as a whole, including, in case of serious deficiencies, the withdrawal of the certification of the group.

In case of lack of reliability and effectiveness of the ICS, the sanction will include to increase the number of farms to be annually visited to at least three times the square root of the number of farms in the group.

ANNEX G. Interpretations of EU 889/2008 regulation (for organic production)

Annex I

Composted animal excrements, including poultry manure and composted farmyard manure shall not originate from "factory farming". Factory farming is a system where animals are unable to move 360 degrees freely, are mainly kept under dark conditions, are kept without animal bedding and where at the same time the production is totally separated from other agricultural activities.

Composting is understood as the microbiological and enzymatic conversion of animal excrements, usually in the presence of vegetal material, under a combination of aerobic and anaerobic circumstances. This means that the manure needs to be treated (e.g. compost heap).

Liquid animal excrements (slurry, urine, etc.)

Need to be treated adequately. That means dilution, fermentation, aeration or other adequate treatments to reduce nitrogen losses to the air, to reduce the solubility of nutrients in water or to reduce the migration of nutrients into the soil.

Inspection and permission

During the inventory, judgement on and permission for the use of animal excrements from non-organic animals will be given if this is appropriate. This permission will be given for a period of one year, evaluated yearly and be kept in force if appropriate.

Article 27

Flavourings within the meaning of Directive 88/388 EEC,
Substances and products as defined in Article 1 (2) (b) (i) and 1 (2) (c) of Directive 88/388 EEC labelled as natural flavouring substances or natural flavouring preparations.."

Interpretation

Flavourings within the meaning of Directive 88/388/EEC may be used in organic products on condition that they are labelled as natural flavouring substances or natural flavouring preparations and that the flavouring ingredient in the flavouring(s) meets the provisions of Article 1 (2) (b) (i) and 1 (2) (c) of Directive 88/388 EEC. They may be used in preparations offered on the market, in accordance with Directive 88/388.

Annex VI, VIII

Perlite

Interpretation

Perlite is interpreted as perlite and related expanded volcanic clay minerals including diatomite perlite, which consists of an aluminium, potassium and sodium silicate complex.

Bentonite

Interpretation

Bentonite is interpreted as a mixture primarily made up of natural clay minerals. Natural clay types such as attapulgus clay, Florida earth, Fuller's earth and palygorskite are also covered by this term. Physically activated clay (by heat, for example) and clay that has been treated with a product listed in the Annexes of 889/2008, the use of which is permitted for this specific purpose or for general purposes are also covered by this term. Bentonite of other clay minerals activated by HCl or other prohibited additives are not.

ANNEX H: Conditions for Publication and Use of the certification logo

Introduction:

This document describes the conditions concerning publication and use of certification logos by customers of Control Union Certifications B.V. (the certificate-holder) with a valid certificate .

Articles:

1. The certificate-holder can only publish those certification-logos that are concerning the valid issued certificate, and does not make or permit any misleading statement regarding its certification, and does not imply that the certification applies to activities that are outside the scope of certification.
2. The certificate-holder can use the CU certification-logo, to be requested at the local office (for a specimen see below)
3. The certification-logos can be used in full colour, as well as in black and white.
4. The certificate-holder can use the certification-logos on letterheads, brochures and other promotion-material. It is not allowed to use the logo on products, packaging, samples or any other declarations concerning a product.
5. It is allowed to reproduce the logo in any other size with exception of the logo of the accreditation council which can never be smaller than 7 mm in diameter.
6. The certification-logo may never be bigger than the size of the company logo on the same document.
7. The logo needs to be reproduced completely (in one piece) always.
8. It is not allowed to use the accreditation logo only.
9. The color-codes for the logo are the following:
 - Blue: PMS Blue 072
 - Light Blue: PMS 299
 - Black: process black
10. It is in no case allowed to use the logo on the product itself, or to suggest that the product is certified itself for clients that do not have a valid product certificate
11. When the certificate-holder does not respect these conditions for use of certification-logos, the certification-holder will stop immediately, without delay, the use against which CU has objected.
12. Besides the actions mentioned in article 11, CU can take the following measurements:

- suspension or withdrawal of the certificate.
- publication of the non-compliance
- juridical procedures

The action taken is depending on the severity of the non-compliance, the results of the non-compliance, and if the non-compliance was made intentionally.

13. Irrespective of the measures taken as per article 11, the decision of Control Union Certifications will in all cases be decisive.
14. In case the validity of the certificate is ended, for whatever reason, the certificate-holder has to stop immediately with the use and/or distribution of promotion-material on which the certification-logo is printed.
15. It is not permitted that the logo is applied to laboratory test, calibration or inspection reports, as such reports are deemed to be products in this context.

Appendix 1:

Logo examples :



ANNEX I JAS label

For JAS label use next to Article 26 of this regulation, the following regulations are applicable:

- Notification No. 513 (processed products) of the Japanese Ministry of Agriculture, Forestry and Fisheries
- Notification No. 514 (fresh products) of the Japanese Ministry of Agriculture, Forestry and Fisheries

The JAS seal:



Minimal indication on a label, JAS organic fresh product:
(JAS seal is obligatory only, when product is imported to Japan)

Organically produced onions¹

CU 012345¹

Always quality Ltd
West Street 23
354 Bombay
India¹


Lot number¹: 1994-DL445

Net content²: 200 grams
Bangalore, India



Place of origin²:

Minimal indications on a label, JAS organic processed product:
(JAS seal is obligatory only, when product is imported to Japan)

Deep-frozen onions organically produced¹		 Control Union Certifications
CU 012345 ¹ Always quality Ltd West Street 23 354 Bombay India	<u>Manufacturer²:</u> Organic Processing Ltd. East Street 23 456 Bombay India	
Names of ingredients ² : onion, water DL445		Lot number ¹ : 1994-
Net content ² : 200 grams India		Country of origin ² :
Best before* ² : 25-10-2008 Bangalore, India	Name of place of ingredient origin:	
Instruction for storage²: Keep in a dry store		

*: the date which signifies the end of the period under any stated storage conditions during which the product will retain any specific qualities. However, beyond the date the food may still be perfectly satisfactory.

¹ : according to CU Inspection Regulation

²: according to Notification No. 513 (processed products) and 514 (fresh products) of the Ministry of Agriculture, Forestry and Fisheries

For the detailed requirements of JAS logo use, please refer to JAS notification number 514 (fresh food) and 513 (processed food). Both is available at our website at www.controlunion.com/certification.

ANNEX J Global Organic Textile Standard (GOTS) Logo



In addition to articles 26, 30 as well as the GOTS logo use requirements document provided by the GOTS International Working Group, the following rules apply with regards to GOTS labelling:

- Use of the GOTS logo is optional. Additional charges for its use apply.
- The GOTS logo is also valid for all products that are certified by CU according to the Global Organic Textile Standard (GOTS), provided that it mentions on the indications that the product has been certified by Control Union Certifications according to the Global Organic Textile Standard.
- Label grades "textile product made with x% organic raw material" and "organic textile product" must be presented in the label

Ownership

- The International Working Group on Global Organic Textile Standard (IWG) has developed and is continuously revising the Global Organic Textile Standard (GOTS) and is its sole owner.
- The GOTS picture-mark, also represented as "GOTS logo" or "GOTS label", is copyright material and is a registered trademark owned by the IWG.
- The use of the GOTS picture-mark is regulated and governed by the IWG; unauthorised use of this copyright material is prohibited and may lead to legal action.
- Processors, manufacturers and traders of GOTS goods that hold a valid GOTS scope certificate by Control Union Certifications (CUC) are considered a Certificate Holder.
- The IWG has approved CUC as certification body (Approved Certifier) thereby granting the CUC the right to sub-licence the use of the GOTS picture mark to Certificate Holders.

Obligations of the Certificate Holder

- The Certificate Holder is entitled and obliged to use the GOTS picture mark in accordance with the Labelling Guide of the IWG (in particular but not limited to point 4.1 and 6 thereof) and together with the following points so as to ensure that the logo user is identifiable on its basis:
 - the applicable label grade [The only label grade available for US market is "made with...organic..."), depending upon the product and Market
 - the reference to the approved certifier ("CU[client number]")
- The Certificate Holder is obliged to inform CUC immediately and truthfully on any changes concerning the identification data of the Certificate Holder and certification status of suppliers, subcontractors, production sites and certified customers.
- The Certificate Holder shall indemnify and hold harmless CUC, the IWG and its representatives and members from and against all claims including product liability,

losses, damages and expenses arising out of this Registration and the use of the GOTS and or the GOTS picture-mark.

Information transmitted

- The Certificate Holder entitles CUC to transmit to the IWG the following information on facilities and/or operators inspected and/or certified on behalf of the Certificate Holder:
 - Company name
 - address
 - production-category
 - product-information
 - product quantities.
- The Certificate Holder entitles the IWG to enter the afore-mentioned information into a public data-base accessible to third parties.

Termination and duration

- CUC retains the possibility to withdraw this sub-licence with immediate effect (suspension) if there are reasons to believe that any of the terms of this Registration, the GOTS Labelling Guide of the IWG or the GOTS-requirements are not being adhered to.
- The Certificate Holder makes known to CUC without delay any unauthorised use of the GOTS picture-mark that it gains knowledge about, including but not limited to any unauthorised use of the GOTS picture-mark by its direct and/or indirect customers and buyers. Failing to do this may have consequences for the certification status of the Certificate Holder.
- Either party may terminate this GOTS Logo use Registration with three months prior notice in writing.
- Should the IWG withdraw or otherwise discontinue the approval of CUC and should a withdrawal of the approval of CUC not be revoked, Control Union Certifications will inform the Certificate Holder without delay. In this case, CUC is entitled to transfer its rights and obligations under this Registration to another approved certifier.
- This Registration enters into force when it has been signed by the legal representative of the Certificate Holder and the logo user has paid the sub-licence fees based on an invoice issued by CUC.



ANNEX K Complaint Form

- If you wish to submit a complaint to Control Union Certifications, please use this form.
- For certain programs separate dispute protocols are in force as specified in the applicable contract: FSC. MSC (see also specific organizations website).
- For certain programs additional dispute protocols are in force as specified in the applicable contract: i.e. BRC (see also specific organizations website).
- An appeal can only be against a certification decision of Control Union Certifications as per procedures described in the terms of contract point 13. For that purpose this form can also be used.
- We kindly request you to specify your complaint as much as possible (“who, what, where, when”) and provide any necessary documentation if applicable.
- You can send this form with any attachments to our certification branch offices or to our office in Zwolle, The Netherlands (certification@controlunion.com) fax: +31-38-4237040).
- An appropriate member of staff (certifier / manager) will confirm receipt of your complaint, with a timeframe of handling the complaint, within two weeks if no improvement can be made before that time.
- We will inform you of the results in writing or verbally, depending on the size and nature of the complaint.
- In case this solution is unsatisfactory the dispute protocol as described in article 14 of the terms of contract comes in force.
- Incomplete complaints cannot be processed.

Attachments may be used

date	
Your company name	
Your personal name	
Your address	
Telephone	
Fax	
e-mail	
Complaint PLEASE SPECIFY YOUR COMPLAINT AS MUCH AS POSSIBLE (“WHO, WHAT, WHERE, WHEN”) AND PROVIDE ANY NECESSARY DOCUMENTATION IF APPLICABLE.	

On the next page an abstract is given on the procedure for handling complaints as specified in the Quality Manual of Control Union Certifications B.V.

Abstract of the procedure to handle complaints:

13.a Scope

Handling of appeals, complaints and improvements

13.b Aim

Efficient registration, handling and evaluation of complaints and to prevent repetition of mistakes and if possible to satisfy the complainant. Implementation and follow-up of measures to improve the quality of the work and the organization (improvements).

13.c Responsibilities

Managing Director: (assistance with) handling of complaints, selection and implementation of improvements, evaluation with complainant;

Quality Manager: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;

Program Manager: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;

Certifier: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;

(Senior) Inspector: assistance with handling of complaints, implementation of improvements.

13.d Execution

1. Complaints

2. Complaints can be received from clients, relations or employees in writing (e.g. by means of the form available on the website) or verbally;
3. Informal complaints are handled in work meetings (see c. Personnel and Organization);
4. Specific instructions may apply for third party inspections. Complaints with regard to this third party (certification system) must be forwarded in writing to this third party immediately. This includes complaints about the inspections, the handling and result of the complaint according to this procedure;
5. The Quality Manager (QM), Program Manager (PM) or the Certifier registers the complaint in CUSI as a specific action: "improvement/complaint" and on an Improvement Form and decides if it is necessary to consult the Managing Director (MD);
6. The MD may decide to handle serious complaints;
7. The QM, PM or Certifier sends a written confirmation of the complaint, with a timeframe for handling the complaint, within two weeks if no improvement can be made before that time.
8. The QM, PM or Certifier handles the complaint within the timeframe as communicated with the complainant and may be assisted by the MD, or the (Senior) Inspector. The handling is registered in CUSI ;
9. The QM, PM or Certifier informs the complainant of the results in writing or verbally, depending on the size and nature of the complaint.

ANNEX L EKO Sustainable Textile (ST) Quality Symbol – in conversion

Lapsed

ANNEX N Organic Exchange Blended and OE100 Standards logo use



figure a



figure b

In addition to articles 26, 30 as well as the Organic Exchange logo use requirements document provided by the The Organic Exchange, the following rules apply with regards to OE labelling:

- The Organic Exchange have implemented two certification logos, one (figure a) for products certified to the OE100 standard, and another (figure b) for products certified to the OE Blended standard.
- Use of the Organic Exchange logos is optional, and only permitted for use by certified projects / companies. Use is permitted, provided that it mentions on the indications that the product has been certified by Control Union Certifications according to the respective Organic Exchange Blended or OE 100 Standard.
- If the company chooses to label the finished products as containing a blend, it should use the "Made with X% organically grown cotton" language, and make reference to the OE Blended Standard. 'X' must represent the final percentage of organic cotton by weight in the finished product.
- If the company chooses to label the finished products as containing organic cotton, it must use "Made with 100% organically grown cotton" or "Made with organically grown cotton and make reference to the OE 100 Standard. Note that the OE 100 standard can be applied to individual components of a product.



The Textile Company
city
Country
Product : Yarn made with 100% organically grown cotton
Code : DL 1234
Certified according to the Organic Exchange 100 (or: OE 100) Standard CUXXXXXX



The Textile Company
city
Country
Product : Yarn made with X% organically grown cotton
Code : DL 1234
Certified according to the Organic Exchange Blended Standard – CUXXXXXX

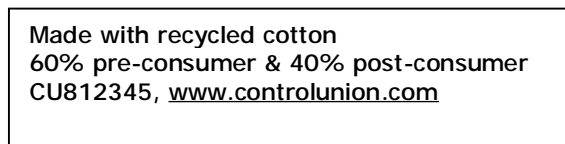
ANNEX O Global Recycle Standard (GRS) logo use



Use of the GRS logo is optional

The GRS logo is also valid for all products that are certified by CU according to the Global Recycle Standard (GRS), provided that it mentions on the indications that the product has been certified by Control Union Certifications according to the Global Recycle Standard.

The GRS label, including or excluding the GRS logo, must be presented as shown in the label examples below.



Annex P: Interpretation Global Organic Textile Standard

All interpretations as made by CU and by the International Working Group of the Global Organic Textile Standard (GOTS) on the Global Organic Textile Standard shall be used and followed by the client in all situations in which the article that interpretation regards, is applicable. The latest edition of the official interpretation as provided by the Global Organic Textile Standard International Working Group is available at www.controlunion.com/certification . The interpretation document of Control Union Certifications, in which these official interpretations are included, are available on request.