| OPGP 4: Regulation (EU) 2018/848 Compliance Affirmation – Group of Operators | | | | | | | Reg (EU) 2018/848 Article 36;  Reg (EU) 2021/279, Articles 4-6 |
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| **Complete this section if your operation is located outside the US and Canada and you plan to export organic products to the EU.** This section is needed to demonstrate compliance with the requirements for a group of operators exporting to the European Union. | | | | | | | |
| 1. **Management of the group and its members, not to exceed 2,000 members.**   Article 36(1)(b) of Regulation (EU) 2018/848 specifies that a group of operators shall only be composed of members whose holding does not exceed the maximum size: 5 hectares, 0.5 hectares in the case of greenhouses, 15 hectares in the case that the entire holding is permanent grassland. However, a member can exceed this size limit only in cases in which:   * + 1. the individual certification cost represents more than 2% of each member’s turnover or output of organic production, which is not more than €25,000; OR     2. the member’s standard organic production output is not more than €15,000.   *A ‘holding’ means all of the production units operated under single management for the purpose of producing live or unprocessed agricultural products.*  *Standard output (SO) is the average monetary value of the agricultural output at farm-gate price, in euro per hectare.*   1. Does the group include any member whose entire holding exceeds the maximum size?  Yes  No    1. If yes, how does the ICS manager verify that each member whose holding exceeds the maximum size does not produce more than the maximum annual standard output of organic production as specified at Article 36(1)(b) of Regulation (EU) 2018/848? | | | | | | | |
| * 1. Use the table below or attach a separate table to show how you determined that any members whose holding exceeds the maximum size are eligible for membership based on maximum annual standard output. Check with your local QCS office for an estimation of individual certification cost. Attach additional table if needed. | | | | | | | |
| **Member name** | | **Standard organic production output (in Euros)** | | | **2% of standard organic production output** | | **Individual certification cost** |
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| 1. How does the group ensure that each member is only registered to this group for its organic product(s) to be marketed through this group alone? | | | | | | | |
| 1. Has the group appointed an Internal Control System (ICS) manager and one or more ICS inspectors whose positions are not combined?  Yes  No   List the personnel in each position in the table of the Organic Producer Group Plan. The description of responsibilities must demonstrate that the ICS manager and ICS inspector perform duties as required in Regulation (EU) 2018/848 Article 36(1)(h).   1. Submit a copy of the written membership agreement template that is to be signed by each member of the group. The agreement must include all the elements required at Article 36(1)(h)(ii) of Regulation (EU) 2018/848 and the rights and responsibilities of the member.  **Attached** 2. How does the ICS manager ensure that each member has signed the membership agreement? | | | | | | | |
| 1. Does the ICS manager agree to immediately notify QCS of any of the following: suspicion of major and/or critical noncompliance; any suspension or withdrawal of a member or a production unit or premises (including purchase and collection centers) from the group; any prohibition of the placing on the market of a product as organic or in-conversion, including the name of the member or members concerned, the relevant quantities and lot identification?  Yes  No 2. Does the group maintain all documents and records for the internal control system as required at Article 5 of Regulation (EU) 2021/279?  Yes  No 3. Do any members ever sell organic products as conventional when organic markets are not available?  Yes  No   If yes:   * 1. How does the Internal Control System verify the total quantities sold by each member?   2. How does the Internal Control System verify that non-authorized substances are not used on the products or on the premises of the organic producer? | | | | | | | |
| 1. **Products requested for organic and in-conversion certification.**   *Products produced during the conversion period shall not be marketed as organic products or as in-conversion products except for: (a) plant reproductive material that have undergone a conversion period of at least 12 months and (b) food products of plant origin and feed products of plant origin containing only one agricultural crop that have undergone a conversion period of at least 12 months.*  Complete the table below for all organic crops requesting organic certification for export to the European Union.   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **Crop** | **Export certification requested** | **Total acreage for EU organic certification**  (Specify acres or hectares) | **Expected total annual production** (Specify Kg or tons per year) | **Label(s) used on products intended for export** | |  | Organic  In-conversion |  |  | Retail  Non-retail | |  | Organic  In-conversion |  |  | Retail  Non-retail | |  | Organic  In-conversion |  |  | Retail  Non-retail | | | | | | | | |
| 1. **Input Substance Verification**   *All substances used or stored on organic and in-conversion crop production units must be authorized for use in organic production and used in accordance with specific conditions and limits as set forth in Regulations (EU) 2018/848 and 2021/1165. QCS may need to obtain detailed information from input manufacturers to verify conformity with specific conditions set forth in the Annexes.*   1. How does the ICS ensure that members do not store any substances that are not authorized for use in organic production anywhere on the organic or in-conversion production units? 2. Does the operation use chitin/crustacean shells or mollusk waste as a fertilizer, soil conditioner, or nutrient?  Yes  No   If yes, list on OGP 10: Inputs and attach documentation that the material is from organic aquaculture or from sustainable fisheries, in accordance with Article 2 of Regulation (EU) No 1380/2013.  **Attachment**   1. Do any inputs used as plant protection products contain one or more of these forms of copper as the active substance: Copper hydroxide, copper oxychloride, copper oxide, Bordeaux mixture, and/or tribasic copper sulfate?  Yes  No 2. If yes, what input(s)?  |  |  | | --- | --- | | Copper input brand name (as listed on OGP 10) | Percent copper | |  |  | |  |  |  1. Does the maximum amount of copper applied in one year ever exceed 4 kg of copper/hectare?  Yes  No   If yes, how does the Internal Control System ensure that, for any member applying copper, the total application over a period of 7 years will not exceed 28 kg of copper per hectare (in compliance with Implementing Regulation (EU) 540/201)?   1. Is farmyard manure, dried farmyard manure, dehydrated poultry, composted animal excrement including poultry manure, composted farmyard manure, or liquid animal excrement used in organic production?  Yes  No   If yes:   1. *All manure and compost must be described at OGP 11: Compost & Animal Manure. Manufactured inputs containing manure or compost must be described at OGP 10: Inputs.* 2. Was manure available from organic production?  Yes  No 3. How does the Internal Control System ensure that the total amount of livestock manure used by each member does not exceed 170 kg of nitrogen per hectare per year? 4. For each source of egg shells and/or manure submit the following documentation, depending on the source.  N/A  |  |  | | --- | --- | | Source: | | | **ORGANIC or In-CONVERSION livestock operation** | **CONVENTIONAL livestock operation** | | Organic or in-conversion certificate for the livestock operation | Submit a signed declaration from the origin of the manure (farm) stating that:   1. Livestock are predominantly able to turn freely through 360°; are not predominantly kept in the dark; and are predominantly kept with bedding;   OR   * 1. Livestock have access to grazing or open air areas. | | | | | | | | |
| 1. **Mushroom Production**   *ANNEX II Part 2.1 of Regulation (EU) 2018/848, which allows substrates only composed of the following materials:*   * *Farmyard Manure or animal excrement* * *Peat, not treated with chemical products* * *Products of agricultural origin, other than farmyard manure and animal excrement, from organic production* * *Wood, not treated with chemical products after felling* * *Mineral products listed at Annex II of Regulation (EU) 2021/1165, water and soil*  1. Are all substrates used for mushroom production listed on OGP 10 and identified as mushroom production substrates?   Yes  No   1. Is farmyard manure/animal excrement used in mushroom production?  Yes  No    1. If yes, include the manure type and source documentation in Section C above.    2. If manure is from conventional production, attach a recipe for the substrate to show that farmyard manure and animal excrement do not exceed 25% of the weight of total components of the substrate, excluding the covering material and any added water, before composting.  **Attachment** | | | | | | | |
| 1. **Management of Holdings**   *A ‘holding’ consists of all production units operated under single management for the purpose of producing live or unprocessed agricultural products. Article 9(2) of Regulation (EU) 2018/848 requires that the entire holding is managed in compliance with organic production requirements. A holding may be split into clearly and effectively separated production units for organic, in-conversion and non-organic production only when different varieties that can be easily differentiated are produced on the non-organic production units (Article 9(7) of Regulation (EU) 2018/848), except that the requirement for different varieties does not apply to research and educational centers, plant nurseries, and seed multipliers.*   1. Is the entire holding of each member managed in accordance with organic production requirements?   Yes – the entire holding of every member is Organic  Yes – the entire holding of every member is Organic or In-conversion  No – the holding of one or more member includes non-organic production that is not in-conversion  **If the holding of any member includes in-conversion or non-organic production, complete the remainder of this section. Organic and in-conversion production units (parcels) must be described in the Producer Group Sub-Unit Information spreadsheet.**   1. How does the Internal Control System ensure that members keep the products produced on organic, in-conversion, and non-organic (if applicable) production units separate from each other? | | | | | | | |
| 1. What records are maintained to show the effective separation of the production units and of the products? | | | | | | | |
| 1. Do any members manage non-organic production units under the same holding?  Yes  No. If yes, list details below.  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Producer Code** | **Producer Name** | **Sub-Unit/Farm Name** | **Production Unit Name** | **Production Unit Location** | **Acreage**  **Acres**  **Hectares** | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  |  1. List the crop(s) and variety(s) grown on each type of production unit.  |  |  | | --- | --- | | Organic |  | | In-conversion  N/A |  | | Non-organic  N/A |  | | | | | | | | |
| ***By way of derogation from Article 9(7)(b), different varieties that cannot be easily differentiated or the same varieties may be produced on the non-organic production units in accordance with the criteria set forth at Article (9)(8) of Regulation 2018/848.*** *Crops must be perennial and require a cultivation period of at least three years. All non-organic production units must be converted to organic production as soon as possible, and within a maximum of five years.*   1. Does the operation request a **derogation** to produce the same varieties or different varieties of crops that cannot be easily differentiated on organic, in-conversion, and/or non-organic production units?  Yes  No If yes, provide these details for compliance.  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | **Producer Code** | **Producer Name** | **Sub-Unit / Farm Name** | **Production Unit Name** | **Planned End of conversion period** | **Crop(s)** | **Cultivation period(s) (years)** | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  * 1. How will you ensure that QCS is notified of the start of harvest of each in-conversion, non-organic, and organic product at least 48 hours in advance?   2. How will you ensure that QCS is notified of the exact quantities harvested from the in-conversion, non-organic, and organic production units? | | | | | | | |
| 1. **Plant Reproductive Material for the production of organic crops**   *In accordance with Annex II (1.8.1) of Regulation (EU) 2018/848, only organic plant reproductive material shall be used for the production of plants and plant products. This requirement applies to all plant reproductive material, including cover crops. Organic operators in third countries may use both organic and in-conversion plant reproductive material obtained from within their own holding provided that it is allowed under applicable national organic legislation.*  *By way of* ***derogation*** *from point 1.8.1, operators in third countries may use non-organic plant reproductive material authorized in accordance with point 1.8.6 when organic plant reproductive material is justified to be not available in sufficient quality or quantity in the territory of the third country in which the operator is located. When organic or in-conversion plant reproductive material is not available in sufficient quality or quantity, the operation must obtain written authorization from QCS to use non-organic plant reproductive material for each crop or cover crop before the sowing or planting of the crop. Authorization is only valid for one season at a time.*   1. What type of plant reproductive material is used by the group? (Check all that apply)  |  |  |  | | --- | --- | --- | | Crop Seeds | Cover crop seeds | Annual seedlings | | Annual planting stock | Perennial planting stock | Meristem culture |  1. Do any members plan to use organic crop and/or cover crop plant reproductive material produced and saved from organic production within the producer group operation?  Yes  No   If yes, list crops:   1. Will any members use in-conversion plant reproductive material produced and saved from its own production?  Yes  No    1. If yes, list crops:    2. How does the Internal Control System ensure that the mother plants have been in-conversion for at least 12 months?   **Attachment**   1. Does the group plan to use in-conversion plant reproductive material sourced from outside the group?  Yes  No    1. If yes, list crops:    2. Attach documentation that the source has been in-conversion for at least 12 months.  **Attachment**    3. How did you determine that organic (or in-conversion, as applicable) plant reproductive material is not available in sufficient quality or quantity? Explain your efforts to source organic plant reproductive material, including what suppliers were contacted and the dates, field trials, etc. and why your efforts were not successful. 2. Do you use or plan to use any non-organic plant reproductive material, from sources outside the group? *Note that the use of non-organic annual seedlings or plant reproductive material treated with prohibited substances cannot be authorized.*   Yes  No If yes:   * Complete and submit the form ***Request for Authorization – Nonorganic Plant Reproductive Material|*** * Wait for written authorization from QCS prior to sowing or planting the crop. | | | | | | | |
| 1. **Packaging & Labeling Verification**   *QCS must verify compliance of all labels used and intended for use on EU organic products, packaging, containers, and commercial documents as applicable, including products that will be handled by another operator prior to export to the EU. Annex III of (EC) No 2018/848 describes the compulsory indications required on product to be imported in the EU and for verification by the importer. References in relation to organic shall be easily visible, clearly legible and indelible. Products exported to the EU shall be accompanied by a Certificate of Inspection. The information mentioned in the Certificate of Inspection shall correspond with the labelling of the products and the accompanying documents.*  Attach a copy of each label used or planned for use on EU organic products, including retail labels and labels used on wholesale packages, containers, transport units or their accompanying documentation. All labels must comply with the EU labeling requirements summarized below and be reviewed and approved by QCS prior to use.  **Attached** | | | | | | | |
| **Labeling Categories** | Agricultural products may be labelled as “organic” or “organically grown.” | | | | | | |
| **Wholesale Containers** | Non-retail containers including but not limited to cases, produce boxes, super sacks, etc. or accompanying documents must include:   * 1. Name and address of the certified operation   2. Product name and organic status   3. QCS certifier code and country code identifying the product’s origin (See below)   4. Traceability information such as lot numbers   Products produced in the US that are not NOP compliant must be labeled “for export only.” | | | | | | |
| **Certifier code** | All labels (retail and non-retail) must use the code number of the control body (certifier) who has carried out the most recent production or preparation of the product. This refers to the farm of origin for unprocessed agricultural products. Operations outside the US, use “<country code>-BIO-144. US operations use “US-ORG-51.” Click here for a list of [country codes](https://www.iso.org/obp/ui/#search). | | | | | | |
| **EU Organic Farming Logo** | Use of the EU organic farming logo is allowed on labels or other marketing material to represent retail products exported into the EU as organic, but use is not compulsory. Click here to download the [EU Organic Farming Logo](https://agriculture.ec.europa.eu/farming/organic-farming/organic-logo_en) and here for the [User Manual](https://agriculture.ec.europa.eu/document/download/6dfbef46-cb5f-43fb-8b79-f0796059285e_en?filename=organic-logo-user-manual_en.pdf).   * The logo must not be smaller than 13,5 mm by 9 mm. In the case of very small packaging where this is not possible, 9mm by 6mm is permitted.EU Organic seal formatting rules are located in 2018/848 Chapter IV * The country and certifier code shall be displayed above or below the EU organic * “Non-EU Agriculture” or “<Country of Origin> Agriculture” must appear below the country and certifier code. The country of origin may be used in place of “non-EU agriculture” only when all material was farmed in that country. | | | | | | |
| 1. **Retroactive recognition of previous period as part of conversion period (Art. 10 of Regulation (EU) 848/2018)**   Are you requesting retroactive recognition of a previous period as part of the conversion period for any parcel requested for certification that is not currently certified?  Yes  No  If yes, complete this section. If no, move on to the next section.  **Eligibility** **for retroactive recognition of a previous period as part of the conversion period.**  The operation must submit documentary evidence to prove that the land parcels were natural or agricultural areas that, for a period of at least three years, have not been treated with products or substances that are not authorized for use in organic production.  **Inspection requirements.** QCS must conduct a physical inspection of the land parcels covered by the request for retroactive recognition to verify the status of the land described below and take samples. Inspection must occur before cultivation of the (Article 24(2) of Regulation (EU) 2021/1698) as described in the table below. Parcels that do not meet these requirements are not eligible for retroactive recognition. | | | | | | | |
| |  |  | | --- | --- | | **Previous land use** | **Inspection must occur** | | Natural area/ fallow land (no food crops present) | Prior to cultivation | | Perennial food crops on abandoned land with little to no management OR natural area with only naturally occurring food crops (wild crops) | Prior to cultivation/management of the crop to be labelled as organic | | Active crop production that is:   * certified to another organic standard, * on land that was previously certified organic and had a lapse in certification for less than one year, or   not certified or previously certified to any organic standard | Annual crop - Prior to cultivation  Perennial crop - prior to the start of the production cycle and management for crop requesting certification |  1. List all sub-units for which you are requesting retroactive recognition of a previous period in the table at the end of this section. All parcels must be listed and described in the Producer Group Sub-Unit Information spreadsheet. 2. Provide a photograph and/or satellite image of each sub-unit requesting retroactive recognition that is clearly labeled and dated to demonstrate the current condition of the land.  **Attached** 3. Attach a map for each sub-unit covered by the request for retroactive recognition that clearly identifies the following features.   **Attached**   * the parcel, its boundaries and adjoining land uses (identify conventional production) * cardinal directions * the total surface area * geolocation coordinates * nature and volume of any on-going crop production  1. Did the member have management control of the land for the entire period seeking retroactive recognition?  Yes  No   *If no, land must have been certified organic while under the control of another operator.*   1. Were any inputs applied to the sub-unit(s) during the period seeking retroactive recognition?  Yes  No   If yes, submit a copy of the input application records for each sub-unit covering the entire period seeking retroactive recognition that identify input products by name and manufacturer and list the date(s) of application.  **Attached**   1. How did the Internal Control System ensure the parcel(s) were not contaminated with products or substances not authorized for use in organic production, such as from nearby conventional production, during the period seeking retroactive recognition? | | | | | | | |
| 1. Were any parcels previously certified to the EU organic standard, but have had a lapse in certification?  Yes  No   If yes, submit the following information:  A copy of the previous organic certificate  Documentation of the certificate’s expiration or cancellation  Verification from the previous certifier that the lapse in certification was not due to the use of or contamination from non-authorized substances  Describe the reason for the lapse in certification   1. How will the Internal Control System maintain documentary evidence of the prior land use(s) for at least 3 years? 2. Attach the following documentary evidence for each sub-unit requesting retroactive recognition showing the prior land use and to prove the land has not been treated or contaminated with products or substances not authorized for organic production for a period of at least 3 years (next page). | | | | | | | |
| **Previous Land Use** | | | | **Additional required documentary evidence** | | | |
| Natural area/ fallow land (no food crops present) | | | | Evidence that the land was in a natural state, abandoned, or otherwise unmanaged and uncultivated and that no products (food crops or wood) were produced or harvested during the period | | | |
| Perennial food crops on abandoned land with little to no management | | | | Evidence that parcels were abandoned and unmanaged | | | |
| Natural area with only naturally occurring food crops (wild crops) | | | | Evidence that parcels were unmanaged with no application of any inputs | | | |
| Active crop production -certified to another organic standard | | | | Valid organic certification under a different regulatory framework (national or international) | | | |
| Active crop production of any crop not certified to any organic standard or with a lapse in organic certification that exceeded 1 year | | | | Documentation from a competent third-party[[1]](#footnote-1) attesting that it verified through on-site inspection at least once during each year requesting retroactive recognition, that the attached input application records are accurate or that the operator did not apply any inputs, and a copy of the inspection reports/summary that identify the inspection dates and findings. | | | |
| **I. Affirmation**  I affirm that all statements made in this EU Regulation Compliance Plan are true and correct. I agree to provide further information as required by QCS. I agree to, in cases where my operation and/or the subcontractors of my operation are certified by different certification bodies to EU standards, the exchange of information between those authorities or bodies; I agree in cases where my operation and/or the subcontractors may change organic certification body, to the transmission of my OSP and related certification documents to the subsequent certification body; I understand that if this operation withdraws from certification to the European Union (EU) 2018/848 & 2021/1165 Regulation Compliance Program QCS shall maintain the operation’s certification documents for a period of at least five years and inform, without delay, the relevant competent authority and control authority or control body; I agree to inform the QCS without delay of any irregularity or infringement affecting the organic status of this operation’s product or organic products received from other operators or subcontractors. | | | | | | | |
| Signature | | | Title | | | Date | |

| OPGP 4: Regulation (EU) 2018/848 Compliance Affirmation – Group of Operators | | | | | | Reg (EU) 2018/848 Article 36 | |
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| **Retroactive Recognition Request – Sub-Unit Information** | | | | | | | |
| **Producer Code** | **Producer Name** | **Sub-Unit/Farm Name** | **Production Unit Name** | **Start of period for which retroactive recognition is requested** | **Describe all land uses during the period requesting retroactive recognition**  (check all that apply) | | **Crop(s) and dates grown (if applicable)** |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |
|  |  |  |  |  | Natural area  Fallow land (uncultivated, no crops)  Unmanaged perennial crops (no harvest)  Wild-crop production  Active crop production | |  |

1. A “competent” third-party must be a distinct entity that is not engaged in management of the operation and that is competent to evaluate input application records through on-site inspection. Examples include but are not limited to: an accredited organic certifier, a certified organic grower group internal control system, or a governmental agency. [↑](#footnote-ref-1)