| OGP 19: Regulation (EU) 2018/848 Compliance Affirmation | | | | | | | |
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| ***Complete this section if your operation is (a) located outside the US and Canada and you plan to export organic products to the EU or (b) your operation produces organic products outside the scope of the equivalence arrangement for your relevant national standard.***  *QCS is recognized by the European Union in Regulation (EU) 2021/2325 and pursuant to Regulation (EU) 2018/848 as a control body with equivalent EU organic production and certification requirements for the purpose of importing organic products into the Union. All exports to the EU require a Certificate of Inspection issued through TRACES prior to departure of the shipment from the country of origin.* | | | | | | | |
| 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.*   1. 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 | |  | 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. Does the operation store any substances that are not listed on the organic system plan and authorized for use in organic production anywhere on the organic or in-conversion production units?  Yes  No   If yes, please explain:   1. Does the operation use chitin/crustacean shells or mollusk waste as a fertilizer, soil conditioner, or nutrient?  Yes  No   If yes, list on **OGP 9: 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.  **Attached**   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 9**) | 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 do you ensure that 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)? QCS will review records to verify application rates during inspection. | | | | | | | |
| 1. Does the operation use farmyard manure, dried farmyard manure, dehydrated poultry, composted animal excrement including poultry manure, composted farmyard manure, or liquid animal excrement?  Yes  No 2. If yes complete the following table. The total amount of livestock manure used must not exceed 170 kg of nitrogen per hectare per year. QCS will review records to verify manure application rates during inspection.   *All manure and compost must be described at* ***OGP 10: Compost & Animal Manure****. Manufactured inputs containing manure or compost must be described at* ***OGP 9: Inputs****.*   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **Manure type** | **Input product name as listed on OGP 10 (if applicable)** | **(A) Percent nitrogen (N analysis)** | **(B) Annual Rate of Application**  **(Kg applied per hectare)** | **(C) = (A x B)/100**  **Annual Kg of Nitrogen applied per hectare** | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | | **Total annual application (Kg of nitrogen/hectare)** | | | Sum of column (C) |  |  1. Was manure available from organic production?  Yes  No 2. 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 9 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 B 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.  **Attached** | | | | | | | |
| 1. **MANAGEMENT OF THE HOLDING**   *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 operation’s entire holding managed in accordance with organic production requirements?   Yes – the entire holding is Organic  Yes – the entire holding is Organic or In-conversion  No – the holding includes non-organic production that is not in-conversion  **If the entire holding is not Organic, complete the remainder of this section. Organic and in-conversion production units (parcels) must be described in the Parcel Information of the OGP.**   1. How does the operation keep the products produced on organic, in-conversion and non-organic production units separate? 2. What records are maintained to show the effective separation of the production units and of the products? | | | | | | | |
| 1. Does the operation manage non-organic production units that are not in-conversion under the same holding?   Yes  No If yes, list details below.   |  |  |  | | --- | --- | --- | | **Parcel Name** | **Parcel Location (physical address or GPS coordinates)** | **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. Parcels that are currently in-conversion must be certified as in-conversion to the EU organic production rules.*   1. Does the operation request a derogation to produce the same varieties or different varieties of perennial crops that cannot be easily differentiated on organic, in-conversion, and/or non-organic production units?  Yes  No    1. If yes, provide these details for compliance.  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Parcel name & location** | **Non-organic Acreage** | **(Planned) Start of conversion period** | **Planned End of conversion period** | **Crop Variety** | **Acreage of same or similar organic variety** | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  |  * 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 your operation? (Check all that apply)  |  |  |  | | --- | --- | --- | | Crop Seeds | Cover crop seeds | Annual seedlings | | Annual planting stock | Perennial planting stock | Meristem culture |  1. Do you plan to use organic crop and/or cover crop plant reproductive material produced and saved from this operation?   Yes  No  If yes, list crops:   1. Do you plan to use in-conversion plant reproductive material produced and saved from your own operation?  Yes  No    1. If yes, list crops: | | | | | | | |
| * 1. How do you ensure that the mother plants have been in-conversion for at least 12 months?  **Attached**  1. Do you plan to use in-conversion plant reproductive material sourced from off-farm suppliers?  Yes  No    1. If yes, list crops:    2. Attach documentation that the source has been in-conversion for at least 12 months.  **Attached**    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 off-farm sources? *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.*   1. 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.” | | | | | |
| **Country and certifier code** | | All labels (retail and non-retail) must display the 2-letter country code and control body code for the operation who has carried out the most recent production or preparation of the product. This should appear as <Country Code>-BIO-144 for QCS certified organic products. Consult the QCS Organic Certification Manual for a full list of country codes. | | | | | |
| **EU Organic Farming Logo** | | Use of the EU organic farming logo is allowed on labels or other marketing material to represent 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://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/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) 2018/848)** 2. 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 one 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 parcels in the table below for which you are requesting retroactive recognition of a previous period. All parcels must be listed and described in **OGP 2**. | | | | | | | |
| **Parcel Name/**  **Number** | **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 | |  | |
| 1. Provide a photograph and/or satellite image of each parcel requesting retroactive recognition that is clearly labeled and dated to demonstrate the current condition of the land.  **Attached** 2. Attach a map for each parcel covered by the request for retroactive recognition that clearly identifies the following features.  * 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   **Attached**   1. Did you 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 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 did you 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 inputs applied to the parcel(s) during the period seeking retroactive recognition?  Yes  No   If yes, submit a copy of the input application records for each parcel 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 will you maintain documentary evidence of the prior land use(s) for at least 3 years? 2. Attach the following documentary evidence for each parcel listed above 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** | | | **File names for attachments** | |
| 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-2) 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. | | |  | |
| 1. **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 |

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-2)