Quality Certification Services (QCS)

PO Box 12311 Gainesville FL 32604

# p 352.377.0133 f 352.377.8363

# www.qcsinfo.org

**Stockfree Certification**

**Introduction**

Stockfree certification can be obtained by interested clients who are currently certified organic under the USDA National Organic Organic (NOP). Growers who do not have a current NOP certificate are not eligible for this program. Successful certification to the Stockfree standards warrants that the grower’s operation is free of animal-based inputs, that the grower does not raise animals for food production or exploit animals for commercial gain, and that the grower does not engage in practices that are harmful to domestic and/or wild animals. The Stockfree standards also regulate additional inputs, such as sodium nitrate, that may be permitted under NOP but are prohibited under the European Union organic program.

QCS certification coordinators and applicants should be familiar with the Stockfree standards, which were developed by Stockfree Organic Services (SOS) and are available at <http://www.stockfreeorganic.net>. QCS and SOS have entered into a contract permitting QCS to verify compliance with the Stock-free standards and issue certificates to clients who meet the applicable criteria.

**1. Step One – Submission of Application Materials**

Because Stockfree certification is an add-on to the NOP certificate, interested clients should submit their Stockfree application materials to QCS with their annual NOP application. The application materials include the following four documents, which are located on the QCS server:

* *Application Form USA (App1USv1)*
* *Self-Assessment of the Additional Stockfree Standards (App2USv1)*
* *Declaration (App3USv1)*
* *Shooting, Poisoning and Cruel Sports Declaration*

The purpose of the self-assessment is to help the applicant determine if his operation is compliant with the Stockfree standards, and what changes may be necessary to bring the client’s operation into compliance.

Clients should contact the QCS office to request a copy of the Stockfree application materials. Once the application materials are complete, the applicant should submit them in duplicate to QCS, along with their NOP application materials and the required fees. First time applicants may seek Stockfree certification mid-way through their NOP certification cycle, but will be required to undergo an on-site inspection and pay all applicable fees. For practical purposes, the applicant’s renewal dates will coincide with her NOP renewal date.

Please see the Stockfree Certification Fee Schedule and Payment Form to determine the appropriate fee. If and once Stockfree certification is granted, it must be renewed on an annual basis with client’s NOP application.

Administrative staff should ensure that the four Stockfree documents listed above are included with the NOP application and are complete. Administrative staff should request any missing or incomplete information. Once the materials are complete, the file is moved to the initial review stage of the certification process.

**2. Step Two – Initial Review of Application Materials**

It is the initial reviewer’s responsibility to ensure that, on the face of the application, all of the self-assessment categories are compliant and the applicant appears able to comply with the standards. If the reviewer determines that, on the face of the application, the applicant is not in compliance with the standards, or if the reviewer needs additional information to determine compliance, the reviewer should request additional information from the client. This request can be incorporated into the request for additional information for the NOP application. The request for additional information should have a timeline for the applicant’s response to ensure ongoing consideration of the application by QCS.

If the client does not provide a timely response to requests for additional information, or if the initial review determines that the applicant is not in compliance with the OS standards, QCS may deny the application. If the initial reviewer determines that the application appears to demonstrate compliance, or the ability to comply with minor modification, the application is moved to the inspection phase of the certification process.

In the *Special Instructions* prepared for the inspector, the initial reviewer should include an instruction that the client is seeking Stockfree certification and list any related areas of concern for the inspector’s attention. The initial reviewer should also attach the *SOS Inspection Form checklist* to the special instructions. The inspection packet should contain a copy of the *Self-Assessment of the Additional Stockfree Standards* and any other relevant Stockfree materials*.*

**3. Step Three – Onsite Stockfree Inspection**

The operation’s Stockfree inspection will coincide with their NOP inspection. The inspector may be an employee of QCS, or may be a qualified and experienced independent contractor.

The inspector will schedule the inspection for a time that is mutually convenient and will follow standard inspection protocol. It is the responsibility of the inspector to verify the implementation and accuracy of the *self-assessment* and to review materials and systems which are best viewed in place, such as recordkeeping and the use of animals and inputs. The inspector should cover all areas of the *SOS Inspection Form checklist* and any special instructions relevant to Stockfree certification.

As with all on-site inspections, the inspector is the “eyes and ears” of QCS. The inspector does not make any decisions; she reports her observations. At the conclusion of the inspection, the inspector reviews with the applicant any areas of concern identified during the inspection and documents these concerns on the *Exit Interview* form. It is normal for the inspection to reveal certain areas of concern, and this does not mean that certification will be denied. It does means that such concerns will need addressed before QCS makes a certification decision.

Once the inspection is complete, the inspector should submit the *SOS Inspection Form checklist*, her response to *Special Instructions*, and any written narrative observations to QCS.

**4. Step Four – Final Review of the Application**

Once the *Inspection Report* is received, the application is assigned to a certification coordinator for final review. The final reviewer’s responsibility is to take a fresh look at the application in light of the inspector’s report, together with all materials submitted by the client, and determine if the operation is compliant with the Stockfree standards.

The final reviewer may request additional information necessary to make a determination on the application and should include a timeline on any such requests. Operations that have minor issues of noncompliance should be given the opportunity to address those issues and bring the operation into compliance. Operations that decline to do so, or that cannot bring their operation into compliance, will be denied certification.

**5. Step Five – Continuing Obligations of Certification**

Maintaining Stockfree certification is an ongoing annual process that coincides with client’s NOP certification cycle. Clients must submit the required application materials each year, undergo an on-site inspection, and pay the required fees.

The granting of Stockfree certification is based on an agreement that the operation will continue to operate according to the *Self Assessment* and any modifications required by QCS to achieve compliance with the Stockfree standards. In addition, the certified operation has an ongoing obligation to respond to correspondence from QCS and to pre-approve with QCS any proposed changes to the operation’s policies, procedures, products, and inputs. Failure to do so is a violation of the certification agreement between the operation and QCS and can lead to suspension or revocation of the operation’s Stockfree certification. Finally, the certified operation must inform QCS of any incidents that impact its Stockfree status or the integrity of any product covered by the Stockfree certificate.

**Complaints and Review of Certification Decision**

QCS must investigate any complaint, from the public or an interested party, regarding our clients’ activities in relation to the Stockfree certification. Complaints must be written and accompanied by supporting evidence, including the complainant’s prior involvement with the operation. The executive director or his designate will conduct an investigation of the complaint. The investigation will be conducted in a confidential and timely manner. Appropriate corrective and preventive action shall be taken to resolve the deficiencies, and such actions shall be documented. If a certified party or applicant refuses to cooperate in an investigation, or in the implementation of corrective measures, QCS may deem this sufficient cause for denial or suspension of the application or certificate. QCS will maintain a record of all complaints.

**Mediation**

Client may request mediation to resolve any dispute with QCS regarding denial, suspension, or revocation of their Stockfree certification. Mediation shall be requested in writing to QCS within 30 days of the date of the denial, suspension, or revocation. If QCS rejects the request for mediation, QCS shall notify the client and advise her of the right to request an appeal within 30 days. If QCS accepts the request for mediation, such mediation shall be conducted according to the mediation procedures established by the Florida State Organic Program, at no cost to the client or QCS. The parties of the mediation shall have no more than 30 days to reach an agreement following a mediation session. Any agreement reached through the mediation process shall be in compliance with the Stockfree Standards. If mediation is unsuccessful, the client shall have 30 days from written notice of the termination of mediation to appeal to QCS.

**Appeals**

Any applicant or certified operation may appeal a decision made by QCS regarding his Stockfree certification. The appeal must be submitted to QCS in writing within 30 days of the denial, suspension, revocation, or notice of unsuccessful mediation. With efforts to avoid potential conflicts of interest, QCS will convene a three member review panel comprised of the following:

1. A QCS certification staff member other than the persons involved in the review or final decision
2. A representative from the industry from which the appeal has initiated
3. A representative from the Stockfree-Organic Services oversight board.

The applicant has the right to review the members of the appeal panel and request a replacement for either the QCS certification staff member and/or the industry representative. Justification for the request, including any potential conflicts of interest, must be submitted in writing to QCS within 30 days of notification of the review panel members. Changes to the review panel will be made within 30 days.

The panel will review the relevant documentation regarding the appeal and make a majority determination within 30 days. QCS will communicate the final decision to the originator of the appeal in writing within 30 days.

Questions:

Please contact QCS Staff @ 353-377-0133 or email qcs@qcsinfo.org