Quality Certification Services (QCS)
5700 SW 34th Street, Suite 349, Gainesville FL 32608
phone 352.377.0133 / fax 352.377.8363
www.qcsinfo.org

QCS QUALITY MANUAL

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1. TERMINOLOGY

These definitions are based on ISO 17000:2014. These definitions may be referenced in the QCS Quality Manual and/or supporting manuals. These definitions are required for certification bodies operating in accordance to ISO/IEC 17065:2012.

Accreditation: Third party attestation related to a conformity assessment body conveying formal demonstration of its competence to carry out specific conformity assessment tasks.

Appeal: Request by operator for reconsideration of a decision made relating to certification.

Application: access to a certification and assessment services offered by QCS.

Audit: A mass balance or a trace-back activity performed by the inspector of an operator.

Certification Decision: An attestation of a statement based on a decision following review that fulfillment of specified requirements has been demonstrated. Review and Certification Decisions may be performed concurrently.

Complaint: expression of dissatisfaction other than appeal by any person or organization to QCS relating to the activities of QCS; whereas a response is expected.

Concurrently: existing, happening, or done at the same time; review and certification decisions.

Conflict (direct, indirect): an issue declared by a person involved in the certification services that if not handled to safeguard the impartiality of the process must then be eliminated accordingly.

Conformity Assessment: is a series of three functions that satisfy a need or demand for demonstration that specified requirements are fulfilled: selection, determination and review and attestation. Such demonstration can add substance or credibility to claims that specified requirements are fulfilled, giving users greater confidence in such claims. Standards are often used as the specified requirements since they represent a broad consensus of what is wanted in a given situation. As a result, conformity assessment is often viewed as a standards related activity.

Declaration: first party attestation.

Evaluation: includes 1) selection, 2) pre-review of application determination, 3) inspection determination and 4) review of inspection.

Impartiality Mechanism: QCS Stakeholder Committee who is authorized with safeguarding impartiality.

Inspection: examination of the operator's conformance to standards.

Inspection determination: information on fulfillment of specified requirements (i.e. Exit Interview).

Openness: to make policy(s) for certification available to the public; transparency.

Operator: a participant in the application and certification services.

Outsourced Service: Subcontractor that provides services for any certification processes; including: granting, maintaining, extending and reducing the scope of certification; including inspection, sampling and laboratory(s).

Pre-review of application determination: information on fulfillment of specified requirements (i.e. Letters request for more information).

Product: an operator's end-product that is identified in the scope of certification.

Review: verification of the suitability, adequacy and effectiveness of selection and determination activities and the results of these activities with regard to fulfillment with specified regulations. Review and Certification Decisions may be performed concurrently.

Safeguarding Impartiality: The Stakeholder's responsibility providing input and insuring polices and principles of impartiality are maintained throughout the certification process, ensure that prevention of commercial or other considerations do not affect impartiality of decision. Additional input on matters affecting impartiality and confidence in certification, including openness.

Selection: Information on selected items. Involves planning and preparation activities in order to collect or produce all the information and input needed for the subsequent determination function. Selection activities vary widely in number and complexity. In some instances, very little selection activity may be needed. (i.e., Plans are published in Certification Program Manual and operator is provided an Application Packet that includes all required documents to complete (i.e., Organic System Plan).

Surrender: An operator's request to discontinue or not renew certification with QCS.

Withdrawal: An operator's request to withdrawal from the application for certification.

2. Introduction

Florida Certified Organic Growers and Consumers, Inc. (FOG) is a not-for-profit grassroots membership organization that is committed to environmentally sound production and processing of food and fiber. FOG encourages the preservation of natural resources, the improvement of soil quality and health through organic and sustainable farming practices. FOG operates an independent third-party certification program, Quality Certification Services, (QCS) to verify organic production, handling and processing methods.

This manual is designed and used to demonstrate how QCS's top management complies with the general requirements of International Standards Organization (ISO) ISO/IEC 17065, as required for the operation of the EU Compliance program, Canadian Organic Regime, GOTS and voluntarily for the operation of United States Department of Agriculture National Organic Program. This manual describes how the QCS program ensures and maintains a quality certification program.

3. Mission Statement

The mission of Florida Certified Organic Growers and Consumers, Inc. (FOG), is to support and promote Organic, Sustainable and Regenerative Agriculture. This mission is carried out through 1) educational programs to increase awareness of and demand for certified organic products and enhance public support of the industry; 2) an organic certification program for growers, processors, handlers and retailers; 3) promotion and support of policies that protect and encourage organic and sustainable agriculture; and 4) complimentary programs that address viable local agriculture, food security, farm land preservation, environmentally responsible farm management, workers and animal welfare, and organic production research.

4. Quality Policy Statement

QCS is committed to providing a top-quality certification program and consumer service, which enables the consumer to purchase QCS certified products with the assurance that they are certified organic according to the current NOP regulations and/or other regulatory or other market requirements (i.e. QCS International Standards).

QCS's purpose is to manage and promote a quality certification program for raw and processed organically grown products. This is achieved with:

a) strict performance in determining operator(s) compliance to regulations/standards,
b) competent, trained inspectors,
c) a review process that ensures thorough review and effective decision making, and
d) a staff of qualified and competent individuals.
e) a commitment to infrastructural resources (facilities/equipment).

QCS refrains from making false or misleading claims about its accreditation status, the USDA and CAEQ accreditation program(s) for certifying agents, or the nature or qualities of products labeled as organically produced.

QCS does not exclude from participation in or deny the benefits of its certification programs to any person due to discrimination because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. Access to certification is not conditional upon the size of the supplier or membership of any association or group, nor is certification conditional upon the number of certificates already issued by QCS.

QCS management ensures that this policy is understood, implemented and maintained at all levels of the organization.

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5. Legal Status

Florida Certified Organic Growers and Consumers, Inc. dba Florida Organic Growers (FOG), is incorporated in the State of Florida as a non-profit corporation with membership comprised of organic processors, handlers, retailers, consumers, farm input suppliers, agricultural information providers, and growers either involved or interested in organic or sustainable agriculture. FOG is a 501(C) (3) organization with the primary purpose of educating its members and the public about policies and practices that concern organic agriculture, certifying organic growers, processors and handlers, and promoting policies that protect and encourage organic and sustainable agriculture. Quality Certification Services (QCS) is a registered “doing business as, dba” name to FOG.

The Board of Directors is subject to the FOG Bylaws and the provisions of Florida Nonprofit Corporation Law.

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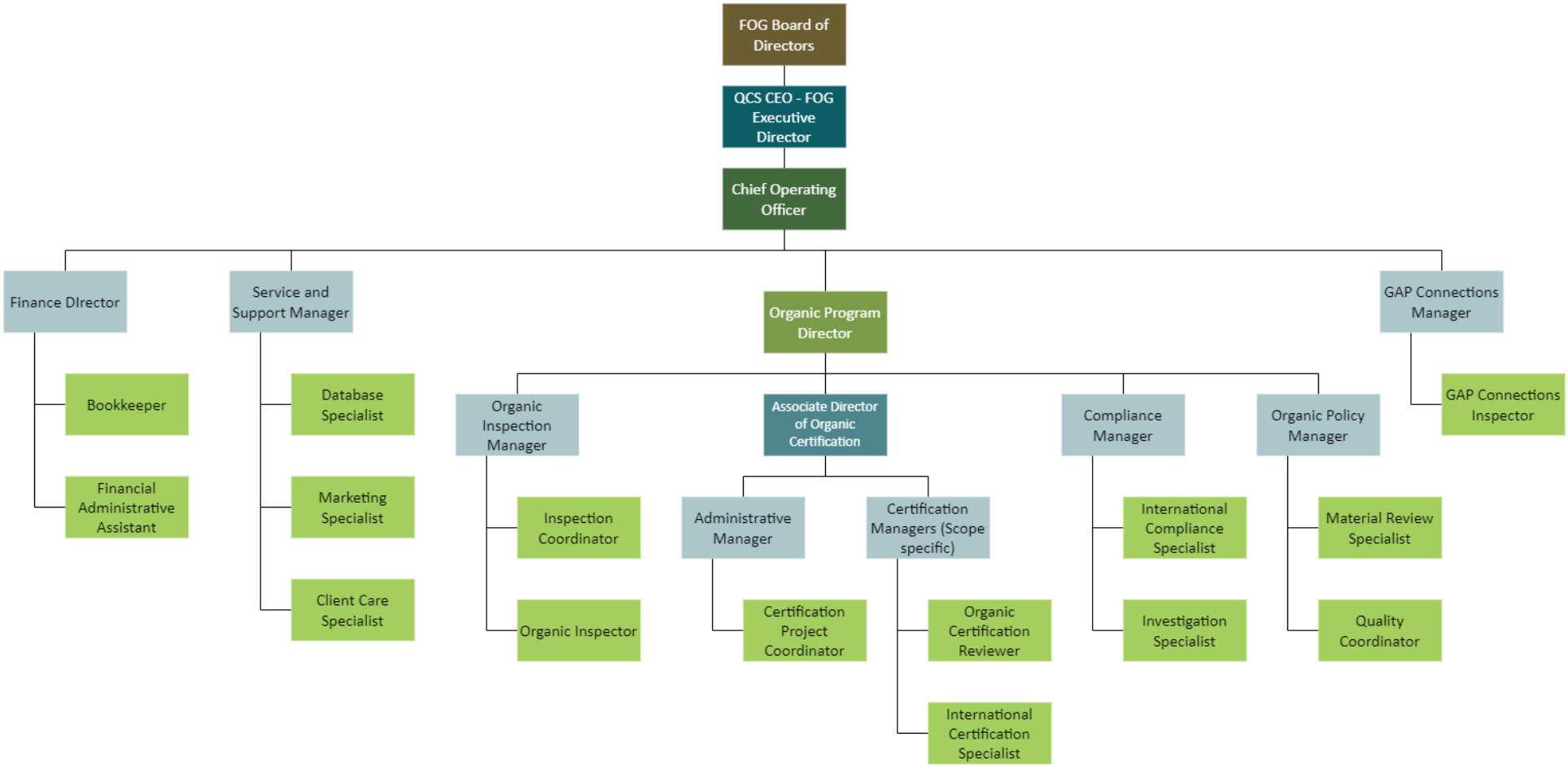
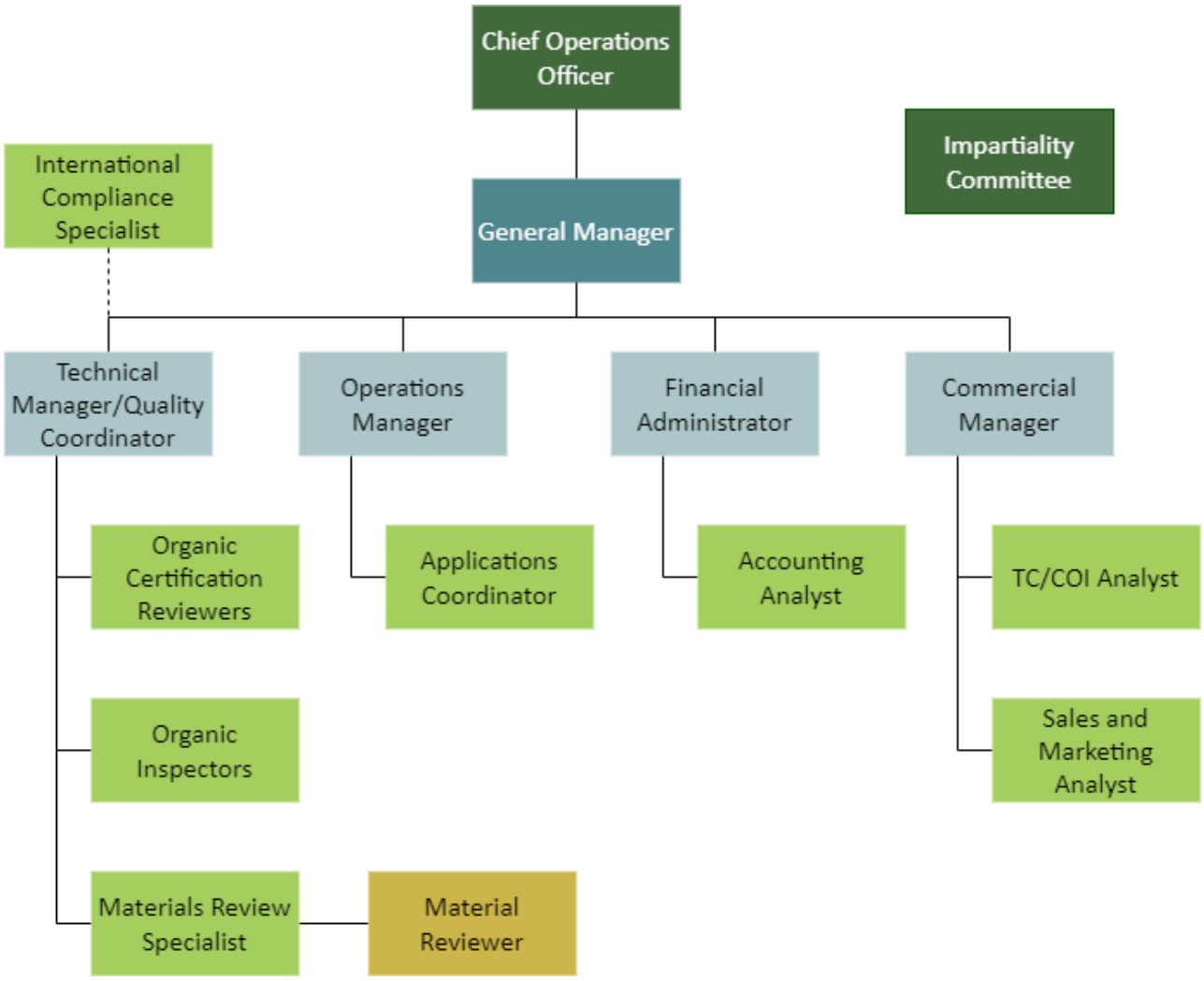
6. Organizational Structure

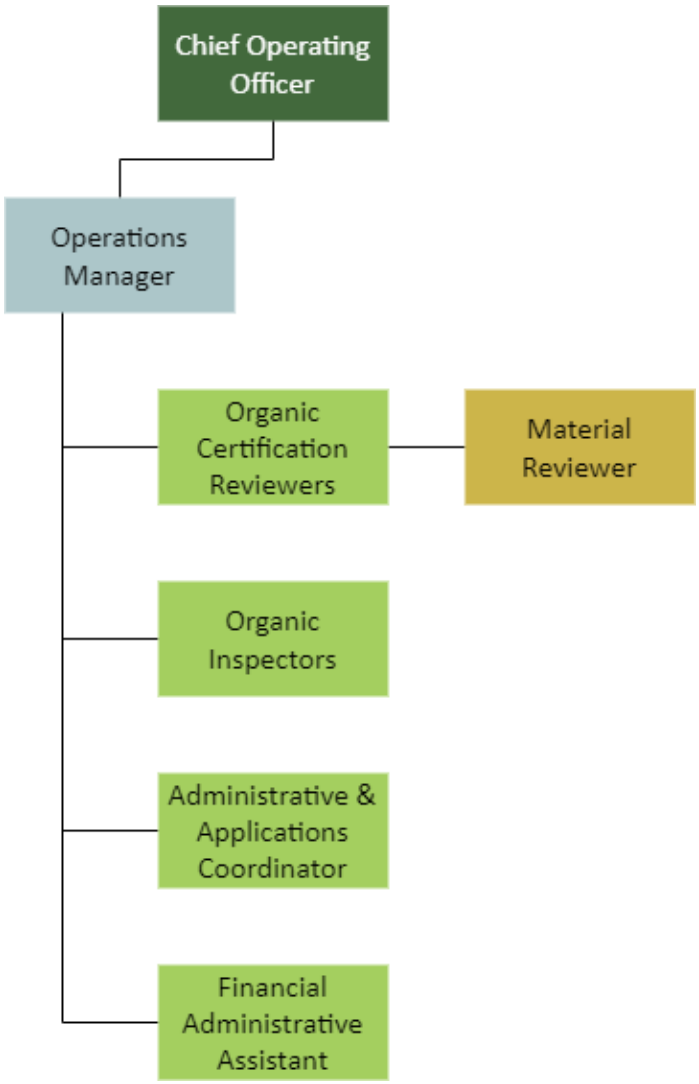
QCS Organizational Chart - Main Office



QCS Organizational Chart - QCS Ecuador



QCS Organizational Chart - QCS Caribe



7. FOG Board of Directors[1]

The FOG Board of Directors is subject to the FOG Bylaws and the provisions of Florida Nonprofit Corporation Law. The terms of reference, which includes but not limited to: the provisions for elections, terms, roles and responsibilities of the Board of Directors. The FOG Board of Directors is comprised of key stakeholders with backgrounds in organic or sustainable agriculture, environmental stewardship, consumer advocates and/or research. In addition to the requirements of the Bylaws, the Board is selected by the Chief Operating Officer based on 1) that they are not certified operators of QCS and 2) consist of a balanced representation; such that no single interest predominates a single interest by vote; including but not limited to: internal and external persons, programs offered by QCS and scopes of operations certified by QCS. The representations are typically chosen from the following: a) organic operation, b) operation with a GFSI food safety program, grower, handler/processor, livestock operation, consumer and/or advocate for sustainable agriculture systems, staff of FOG, staff of QCS and farmer with practical food safety background and a consumer and/or advocate of sustainable food businesses, etc.

Board Position	Name	Representation
President	Logan Petrey	Organic farmer and agronomist
Vice President	VACANT	
Secretary	Teresa Pemberton	
Treasurer	Jesse Haskins	Jesse Haskins started J Haskins Law, P.A. to focus on local food communities. Prior to dedicating his practice to local agriculture, Jesse served as assistant attorney general for the State of Florida

[1] ISO/IEC 17065 5.2

8. SAFEGUARDING IMPARTIALITY COMMITTEE

Due to the nature of the balanced representation of stakeholders on the FOG Board of Directors, the FOG Board of Directors is authorized by QCS as the mechanism for safeguarding impartiality for QCS.

The Safeguarding Impartiality Committee oversees the policies and procedures implemented by QCS for preventing and handling conflicts are per the impartiality requirements of the QCS Organic Certification Manual.

QCS provides resources to the Safeguarding Impartiality Committee once per year via the Management Reviews report in Section 22. ,The Management Review report includes an overview on the inputs analyzed by management; including a review of the Risk to Impartiality Analysis report, statistical data on how many issues relating to conflicts of interest that QCS handled over the course of the report, any changes to policies and procedures pertaining to safeguarding impartiality in the Quality Manual, Certification Manual and supporting documents and the management's recommendation of output to improve, sustain or make changes to the structure for safeguarding impartiality.

The Safeguarding Impartiality Committee is responsible for providing feedback to the Chief Executive Officer regarding any issues with QCS's system for offering objective certification services. If the Chief Executive Officer does not follow the input related to impartiality, the Stakeholder Committee has the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders); only after appropriate action is taken to first try and resolve by both parties; which includes, respecting confidentiality; feedback that is in conflict with the operating procedures of the certification body or other mandatory requirements should not be followed until determined otherwise and Management should document the reasoning behind the decision to not follow the input to the Board. If this is unsatisfactory, the Board may take independent action. The FOG Board of Directors is also subject to the same Impartiality policies as the QCS staff, see Impartiality Policy, QCS Organic Certification Manual. Annually, QCS requires members of the Board to sign QCS documents; including the QCS Conflict of Interest and Confidentiality Statement Commitment Agreement.

The Board of Directors delegates authority to the Chief Executive Officer to implement the certification program on its behalf.

9. Chief Executive Officer

The Chief Executive Officer is authorized by the FOG Board of Directors to operate the QCS certification services, including responsibilities for:

1. Ensuring adequate resources are available to operations (i.e., human resources, quality management)
2. Delegation of responsibilities to competent committee members, personnel, contractors and subcontractors;
3. Supervise the competency and monitoring of human resources;
4. Supervise the QCS finances for the certification program(s);
5. Supervise the management system; including the development and implementation of policies and procedures used to operate reputable certification program(s)
6. Supervise the activities and requirements for certification, evaluation, review, decisions on certification and related appeals;
7. Supervise all complaints received by QCS related to the operations of QCS and/or FOG.
8. Final decisions on all contractor and subcontractor agreements;
9. Signatory of the Certificates issued by QCS.
10. Ensuring that processes and procedures needed for the management system are established, implemented and maintained;
11. Reporting on the performance of the management system and any need for improvement and/or resources, see Management Review.

For more information on other roles and responsibilities, refer to the Job Descriptions in the Human Resource folder in the Quality System.

10. Inspectors

QCS uses both staff (employees) and independent contract inspectors to conduct inspections. Inspectors who are trained as reviewers may also conduct the initial review (pre-inspection) or an organic system plan application or renewal. However, inspectors do not participate in certification-decision making. A full description of QCS inspector/inspection policies can be found in the QCS Inspection Manual.

11. Certification Reviewers

The Governing Board is responsible for certification decisions and authorizes Certification Decisions to the Chief Executive Officer, who is responsible for overseeing the Certification Managers and Reviewers. Certification Reviewers are individually responsible for reviewing inspection reports and rendering certification decisions and signing certificates for QCS's certification programs as specified in Section 3, of the QCS Certification Manual. Certification Reviewers must comply with the provisions of Section 7 above.
Certification Reviewers are selected and authorized by the Chief Executive Officer to have the overall responsibility for the decisions on certification and have the technical basis for granting certification.

12. Qualifying Certification Reviewers and Inspectors

Certification Reviewers and Inspectors must meet a minimum level of qualification per scheme and scope to perform duties as assigned.

Upon hire and as part of the annual performance review, the supervising manager will evaluate the qualifications for each certification reviewer or inspector and ensure all qualifications are documented in the appropriate personnel folder. The supervising manager assigns the scheme(s), scope(s) and audit type(s) each individual can perform based on their qualifications in the QCS database. This assignment limits the reviews and inspections that can be assigned to only the scheme(s), scope(s) and audit type(s) approved in the database. The supervising manager can approve and add qualified scope(s), scheme(s) and audit type(s) for a certification reviewer or inspector in the database at any time when new qualifications are gained, such as completing training for a new scheme or scope. QCS maintains records of training completed after hire to document additional qualifications.

Minimum qualifications for Certification Reviewers

All Certification Reviewers that are involved with reviewing files must meet the following conditions for reviews to the NOP certification Program.

1. BS Degree or equivalent or 2 years work experience in agriculture, science, food safety, manufacturing, or relevant field and
2. QCS Training, IOIA training and/or equivalent training as approved by QCS.
3. Demonstration of one of the following per scope as follows

Program Scope	NOP
Crop	Experience in an agriculture related field or Training in organic agriculture topics or reviews
Wildcrop	Experience in a wild-harvesting related field or Training in organic wildcroping topics or reviews
Livestock	Approval for Crop Scope Experience in a livestock related field or Training in organic livestock topics or reviews For Ruminant livestock- Training in the NOP pasture rule or IOIA livestock training post 2010
Processing	Experience in a processing/manufacturing related field or Training in organic processing/manufacturing topics or reviews
Producer Group	Approval for Crop and Processing Scope + Experience in a producer group related field or Training in organic producer group topics or reviews
Aquaculture	Experience in an Aquaculture related field or Training in organic Aquaculture topics or reviews

4. For qualification to QCS's additional certification programs, certification reviewer must meet the following:
    a. COR Reviews:
        i. Meeting points 1 and 2 above
        ii. Experience or Training on COR Standards
        iii. Demonstration of one of the scope qualifications per point 3 above.
    b. EU Reviews: Approval for NOP reviews and
        i. Experience or Training on EU Standards

Minimum qualifications for inspectors

All Inspectors that are involved with inspecting operations must meet the following

1. BS Degree or equivalent or 2 years' experience in agriculture, science, food safety, manufacturing or relevant field, and
2. Practical inspection course setting out basic principles of inspection, and/or IOIA training and or QCS Training and/or equivalent training as approved by QCS.
3. Demonstration of one of the following per scope as follows;

Program Scope	NOP
Crop	Experience in an agriculture related field or Training in organic agriculture topics or inspections
Wildcrop	Experience in a wild-harvesting related field or Training in organic wildcroping topics or inspections
Livestock	Approval for Crop Scope + Experience in a livestock related field or Training in organic livestock topics or inspections For Ruminant livestock- Training in the NOP pasture rule or IOIA livestock training post 2010
Processing	Experience in a processing/manufacturing related field or Training in organic processing/manufacturing topics or inspections
Producer Group	Approval for Both Crop & Processing Scope + Experience in a producer group related field or Training in organic producer group topics or inspections
Aquaculture	Experience in an Aquaculture related field or Training in organic Aquaculture topics or inspections

4. For qualification to QCS's additional certification programs, inspectors must meet the following:
    a. COR Reviews:
        i. Meeting points 1 and 2 above

ii. Experience or Training on COR Standards
iii. Demonstration of one of the scope qualifications per point 3 above.

b. EU Reviews: Approval for NOP reviews and
   i. Experience or Training on EU Standards

13. Human Resource Requirements

The Chief Executive Officer is authorized to oversee all responsibly connected to operating the daily functions of the certification programs.

The QCS Human Resources Tracking Form provides a current list of QCS personnel, contractors, subcontractors and certification reviewers.

The Personnel Manual includes the procedure for the recruitment, selection, training, and monitoring of personnel. Minimum competencies for all staff and inspectors are outlined in the QCS Job Descriptions. The qualifications and experience of each employee can be found in the individual's personnel file.

All QCS staff must sign an acknowledgment that they have read and understand the Personnel Manual and the Quality Manual.

QCS employs a sufficient number of qualified staff to perform certification functions as determined by the Executive Director in consultation with the Chief Executive Officer.

14. Conflict of Interest

All persons responsibly connected to FOG & QCS certification services including the Board of Directors, personnel, committee members, contractors, subcontractors must agree to the Certification Manual, Section Impartiality.

15. Confidentiality

All persons responsibly connected to FOG & QCS certification services including the Board of Directors, personnel, committee members, contractors, subcontractors must agree to the Certification Manual, Section Confidentiality.

16. Performance Monitoring

The Executive Director is evaluated annually by the Board of Directors.

The Chief Executive Officer receives an annual performance review from the ED. The review includes accuracy in file maintenance, and interaction with staff, growers, inspectors and the general public.

All other certification staff and subcontractors receive annual performance reviews from the Chief Executive Officer or their delegate. The review includes full knowledge of the QCS Certification Manual and standards, knowledge of the Certification Process, accuracy in file maintenance, interaction with staff and certification applicants, as appropriate.

The Inspection Manager or satellite office manager evaluates inspectors on an annual basis. Inspectors are reviewed regarding the timeliness of their reports and the clarity and completeness of the reports. Inspector evaluation forms are provided to each operation who undergoes inspection. They are filled out by applicants and certified operations on a voluntary basis. These reviews are kept in the inspector's file and used during the annual review of the inspectors. Inspectors will also be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least once every five years based on risk.

These performance reviews, along with internal audits, are to ensure that the certification process is carried out efficiently and in compliance with ISO 17065 standards and relevant QCS standards.

All staff are informed of the outcome of their evaluation. Any corrective action is expected immediately. All performance evaluations are filed in the individual's file.

17. Certification Procedures

QCS has an overview of each Certification Step in the QCS Certification Manual. References to pertinent policies and procedures that are made public are identified below. Internally, QCS has procedures and work instructions that are used to operate the certification program; including but not limited to: the Organic Program Manual, Organic Policy and Guideline Handbook, Organic Certification Review Procedures, Organic Inspector Manual and entirety of the Quality System, which includes templates used for each step of the certification process (i.e., Application, OSPs, review forms, etc.). These internal documents are not made public or to be shared with outside sources, and are only available onsite upon request.

Certification Flow Chart

See Section 05. Certification Steps in the QCS Certification Manual for the Certification Process flow chart.

Application

See Section 05. Certification Steps in the QCS Certification Manual for Administrative Procedures for applying for QCS organic certification.

Certification Review

See Section 05. Certification Steps in the QCS Certification Manual for the certification review process.

Noncompliance(s), Suspension and Decertification

It is the responsibility of the QCS applicant to understand and comply with all standards of certification. See Section 05. Certification Steps in the QCS Certification Manual for procedures regarding noncompliances, suspension and decertification.

Appeals and Mediation

The procedural steps in the mediation and appeals processes are addressed in Section 6 Mediation and Appeals of the QCS Certification Manual.

18. Requirements for export of U.S. organic raw and processed agricultural products to Foreign Countries

The Operations Director is responsible for the issuance of Export Certificates as outlined in the QCS Certification Policies and Procedures. The Administrative Assistant may issue Export Certificates in the event that the Operations Director is absent. Requirements for export of U.S. organic raw and processed agricultural products to Japan, Korea and Taiwan are located on the USDA NOP website and the CIFA website.

Voluntary Standard for operations exporting products

All certified operations wishing to export may request to have the following voluntary standard verified during their annual inspection so as to expedite acceptance of product into foreign markets.

1. Complaint Log as outlined in the QCS Certification Manual must be maintained.

19. INTERNAL AUDITS

Performing internal audits is a preventive measure taken by QCS to ensure to ensure that the certification program is operating efficiently and in compliance with appropriate criteria and standards and results of previous internal and external audits, the Internal Auditor performs various internal audit activities during the course of each year. QCS's internal audits shall normally be performed at least once every 12 months or completed within a 12- month time frame for any additional or segmented internal audits. Internal audits may include performing document reviews, completing checklists for accreditation reviews, reviewing certification and personnel files, verifying correction of previously issued internal and external noncompliances and internal review findings, interviewing management, etc. QCS may perform internal audits to demonstrate preparedness for accreditation visits, compliance to standards updates and effectiveness for operating certification in compliance with requirements and standards.

Internal Audit activities are carried out in accordance to ISO/IEC 19011. At the beginning of each internal audit, the Internal Auditor issues an Internal Audit Plan to the Organic Program Director. The Internal Audit Plan is presented to the management at an Opening Meeting. If approved, the management signs and dates the report. The Internal Audit Plan identifies the primary scope(s) to be verified for compliance during the course of activities. The Internal Audit plan also identifies references that may be used, as well as an overview of any conflict of interest issues (i.e., backups for auditing areas for which the auditor cannot audit their own work). The plan also provides a tentative schedule for the timeframe for which activities are to be conducted. This timeline is flexible and is reissued at the closing meeting, as well as reset at the next Opening Meeting. The intent of the schedule is to ensure over the course of 12 months that all necessary activities are performed to conclude that all areas of compliance have been verified by the Internal Auditor. The Internal Audit Plan also identifies the type(s) of activities that may be used by the Internal Auditor to perform verifications (i.e., document reviews, interviews, etc.).

For performing the internal audit, the Internal Auditor sets up an internal audit folder in the Quality System that is active; meaning it's not a controlled folder but one that transparently demonstrates the various activities, records, and verifications that the Internal Auditor is working on during the course of an internal audit. The Internal Auditor uses an Excel Checklist that is loaded with various compliance criteria and activity notes. The Internal Auditor is only responsible for marking which areas have been performed; notes are only required when a noncompliance is identified. The Internal Auditor may opt to provide as many notes as necessary to record activity(s).

Once the Internal Auditor comes to a reasonable stopping point, an Internal Audit Report is issued to the management at an Exit Meeting. The report contains a brief overview of activities and the number of noncompliance(s) found during the activity(s). It also includes a schedule, which identifies areas that may need to be transferred to the next internal audit activity(s) and lists all the noncompliance(s) identified by the Internal Auditor. During the Exit Meeting, management review these findings, and may dispute or challenge any of the findings with the Internal Auditor. If the Internal Auditor finds the dispute(s) justifiable, the findings

may be dropped and the reasons for that are recorded in the Internal Audit report in the notes section. After the meeting, the updated Internal Audit report is then sent to top management for their signatures of approval.

After each Closing Meeting, the Internal Audit Report is sent to the Organic Program Director who then creates a Corrective Actions report and loads it with the criteria and noncompliance(s) from the Internal Audit Report. The report is handled in accordance to the Corrective Actions Process.

To conduct internal audits, QCS uses persons knowledgeable in certification, auditing and the requirements of ISO 17065 and have experience performing internal audits. Additionally,

Auditors do not audit their own work;
Auditors work is independent of the evaluation, review and certification decision making process.
Personnel responsible for the area audited are informed of the outcome of the audit;
Any actions resulting from internal audits are taken in a timely and appropriate manner; and
Any opportunities for improvement are identified.

20. Corrective Actions Process

QCS identifies and manages nonconformities in its operations received from internal and/or external audits. QCS then takes action(s) to eliminate the causes of nonconformities in order to prevent recurrence. QCS shall implement corrective actions, appropriate to the impact of the problems encountered.

QCS's Corrective action process:

1. identifies nonconformities (e.g., from complaints and audits);
2. determines the causes of nonconformity;
3. corrects the nonconformities;
4. evaluates the need for actions to ensure that nonconformities do not recur;
5. determines and implements the actions needed in a timely manner; and
6. records the results of actions taken;

The Organic Program Director is responsible for ensuring that Corrective Actions are documented, communicated internally and externally, and carried out in a timely manner. The QCS Management team and any other necessary personnel key to the success of the corrective actions may meet to perform any of the above processes. The Organic Management Team monitors progress and effective implementation.

21. Preventive Actions Process

QCS shall take preventive actions to eliminate the causes of potential nonconformities. The preventive actions shall be appropriate to the probable impact of the potential problems. The preventive actions process shall include the following:

1. Identification of potential nonconformities and their causes;
2. Evaluation of the need for action to prevent the occurrence of nonconformities;
3. Determination and implementation of the action needed;
4. Recording the results of actions taken; and
5. A review of the effectiveness of the preventive actions.

Examples of Preventive Actions QCS uses includes the following:

1. Implementation of the Quality Manual;
2. Publication of a Certification Manual to its Operators;
3. Annual Performance of Internal Audits and Corrective Action Process(s);
4. Annual Management Review(s) and
5. Ongoing Document and Record Control(s).

22. Management Reviews

The Chief Executive Officer and the top management of QCS reviews its quality management system annually in order to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfillment of ISO/IEC 17065. The management review, decisions and directives are recorded in the official meeting minutes.

Management Reviews consist of defined review inputs and outputs. The QCS top management; review the system and report on the following inputs:

1. Results of internal and external audits;
2. Feedback from clients and interested parties (including scheme owners) related to the fulfillment of ISO/IEC 17065;
3. Feedback from the mechanism for safeguarding impartiality;
4. The status of preventive and corrective actions;
5. Follow-up actions from previous management reviews;
6. The fulfillment of objectives;
7. Changes that could affect the management system; and
8. Appeals and complaints.

After taking the inputs into consideration, the QCS top management provides the decisions and actions QCS will provides outputs as follows:

1. improvement of the effectiveness of the management system and its processes
2. improvement of the certification body related to the fulfillment of ISO 17065:
3. resource needs

As part of providing QCS Stakeholder Committee adequate access to safeguard impartiality, QCS annually or more often as applicable; provides the Management Review report to the Stakeholder Committee to review.

23. RECORDS[2]

The applicant's certificate, a copy of the application, the inspection report, and supplemental information are filed at the QCS office and contain up to date, relevant information, including history, and product specifications. The records demonstrate the way in which each certification procedure was applied, including inspection reports and outcome of imposed sanctions, and maintained transparently and enabling easy retrieval of information. For QCS clients, separate records are kept for major violations and resulting sanctions, precedents, exceptions, appeals, and complaints, in a way that enables easy retrieval of such data.

Authorized personnel sign inspection reports, certification decisions, certificates and other relevant records. The QCS office prints all certificates with the original sealed certificate sent to the applicant and copies placed in the applicant's files.

A current database is maintained of the certified parties. The information for growers contains the acreage, crops, products, and livestock. The information for the Processor/Handlers contains certified products and services and co-packer operations. The information for producer groups contains the acreage, crops, products, and livestock. These databases are updated annually at the time of renewal.

Applicants' files are only accessible to the applicant, certification staff, auditors, Board of Directors, accreditation authorities and law enforcement authorities. See Section 19, Release of Records for policies on the release of documents.

QCS maintains records to be identifiable, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. QCS must maintain records according to the following schedule:

a)	Not less than 5 years beyond their receipt	Records obtained from applicants for certification and certified operations
b)	Not less than 10 years	Records created by QCS regarding applicants for certification and certified operations
c)	Excluding any records covered by b), must be maintained for not less than 5 years beyond their creation or receipt	Records created or received by QCS pursuant to the accreditation requirements of NOP USDA Subpart F.

Records in the above schedule must be maintained beyond the allotted time before disposal. Proper disposal may include shredding.

[2] IOAS AC 5.4.1, 5.4.3-5.4.10 and USDA NOP 205.510.b.1-3

Records Transfer: Should QCS dissolve or lose its accreditation all records or copies of those records will be sent via registered mail to the appropriate accreditation bodies.

24. Release of Records to Public[3]

All QCS staff are authorized to release any records in a member's file to the public upon request according to the following guidelines. Everyone involved in the certification process including inspectors, staff, Executive Director, Certification Program Director, Certification Reviewer(s) and the Board of Directors are required to treat all information and records as confidential except for information routinely available to the public. Any information relevant to an operation's certification status supplied to QCS by the operator, the public or collected in the course of a QCS inspection becomes the property of QCS.

See Section 1.3 of the QCS Certification Manual for information that is routinely made available to the public.

Inspection reports, or other confidential client documents, are not normally made available outside the certification system. However, these may be released with the following guidelines:

1. The applicant may request in writing the release to a third party his/her inspection report.
2. QCS will release any and all reports to law enforcement authorities, including State organic programs governing State officials, the Administrator of the Agricultural Marketing Service of the USDA and other accreditation authorities.
3. Upon receipt of a signed document release form by the certified entity.
4. To facilitate the certification compliance communication between certification bodies and the transfer process to/from QCS, QCS shall exchange relevant documents.

For QCS International clients, QCS shall produce and make publicly available an annual report summarizing the certification activities of the previous year including elements such as the extent of the certification activities.

[3] IOAS AC 5.4.2

25. Document Control

QCS encourages all persons significantly affected by the policies, principles and functioning of the certification system, to participate in their development and improvements of the Quality System.

The documents used in QCS's certification programs are developed by QCS to address the individual program needs; including general QCS documents, scheme standards and documents and any applicable ISO standards. These documents are located in the QCS Quality System. The most current version of these documents are registered in the QCS Quality System on the main server. All QCS staff have access to the Quality System at all times.

Document changes can be requested at any time. Staff members are encouraged to communicate with the Organic Policy Manager to request a change to a document. If management deems the change necessary, the changes are made to the documents by the requester, Quality Coordinator or designee of a relevant manager. Documents are controlled in the Quality System upon their approval and are effective once formalized in the quality system. The process of controlling the document is recorded on the Quality Systems Master List of Documents/Records. The Quality Coordinator notifies management when the document is controlled. Management is responsible for ensuring that the document is fully implemented by QCS. Twice per month, the Quality System Coordinator issues a notice to QCS staff of all documents that have been controlled in the past half of the month.

Staff members are also informed of document revisions during weekly staff meetings. Staff must always source their documents directly from the Quality System. All persons operating in accordance to the Quality System, at minimum including adherence to the quality manual and the use of documents located in the Quality System, must use the most current versions located in the Quality System and may not use any uncontrolled documents. Any use of uncontrolled documents jeopardizes QCS's accreditation and compliance to accreditation criteria and scheme standards.

Documents are effective the day they are added to the Quality System. This effective date is located in the footer of each document, or in the master list of documents. It is the responsibility of the document user to verify that the document being used is the latest version, particularly before a mass release or usage of such document. The document user may refer to the most recent registered Master List of Documents/Records to verify which version of the document should be used. Users of controlled documents are not allowed to remove the document control numbers from the documents retrieved from the Quality System.

26. SUBCONTRACTING

QCS subcontracts all inspection and testing services with competent third-party inspectors and/or laboratories. All inspectors must meet QCS requirements and be on the approved inspector list (see approved inspectors list reference in Section 13). QCS contracts with accredited laboratories for testing of soil samples or vegetative material for evidence of prohibited pesticides or genetically modified DNA. QCS approved laboratories are selected based on tests performed. Laboratories used by QCS must demonstrate competency via accreditation, certification and/or licensure with recognized authorities.

The hiring of subcontractors does not absolve QCS from its responsibilities for the contracted services, granting, maintaining, extending, suspending or withdrawing certification. When QCS subcontracts work related to certification to an external body, or person, an agreement covering the arrangements is drawn up. This shall include the requirement to comply with all relevant aspects of these criteria.

To be on the Approved Inspector list, inspectors must meet QCS requirements outlined in Section 12. See Section 13 for inspector evaluation and review procedures.

QCS Approved Commercial Laboratories

Laboratory Name and Contact Information		Type of Analysis
AGQ Labs	*Physical Address* 2451 Eastman Ave. Ste. 1 Oxnard, CA 93030 *Shipping Address* Frente a Casa Espańa Local 2B Sabana Norte San Jose, Costa Rica 00 506 2232 0832 Andres.villalobos@agq.co.cr	Pesticide Residue Analysis
Delft Research Group B.V. Groen Agro Control *Using the commercial representative in Ecuador - Agrolab Company SA*	*Physical Address* Distributieweg 1 2645 EG Delfgauw The Netherlands *Shipping Address through commercial representative in Ecuador* Agrolab Company SA Alborada 13 ava Etapa Mz 20 Viila 14 Guayaquil Ecuador	Pesticide Residue Analysis
Eurofins Food Chemistry Testing Madison, Inc.	*Shipping Address* Eurofins Food Integrity & Innovation-Attn Sample Management 6304 Ronald Reagan Ave. Madison, WI 53704 *Billing Address* Eurofins Food Chemistry Testing US Inc. P.O. Box 11407 Dept. 5894 Birmingham, AL 35246-5894	Pesticide Residue Analysis
Primoris Holding cvba. Technologiepark-Zwijnaarde 90. 9052 Gent.	*Shipping Address* Laboratorio Lasa. Juan Ignacio Oe 55-97 y Simón Cardenas. Quito, Ecuador 170511, Ecuador	Pesticide Residue Analysis

	Billing Address Primoris SAS Ecuador RUC: 1793162819001, Cuenta Corriente 2100248597;	
CNTA SAC dba Mérieux NutriSciences	*Shipping Address* José Ronald Aquiroga Noblecilla CI 00249973 - Servientrega Huaquillas, Huaquillas, Ecuador *Billing Info* Bank: Pichincha Cta. No. 2203180659 Agent name: Sandra Alla Saltos Cl. 062765042	Pesticide Residue Analysis
Eurofins Lab Zeeuws Vlaanderen (LZV) B.V. Graauw *Using the commercial representative in Ecuador – Agrorum S.A.*	*Shipping Address through commercial representative in Ecuador* (Agrorum) Av. San Jorge #205 y calle 2Da Oeste Guayaquil, Ecuador Billing Info Zandbergsestraat 1 4569 TC Graauw Bonaire, Netherlands	Pesticide Residue Analysis
SGS Mersin Özel MSM Gida Kontrol Laboratuvari ve Dan. Hiz. Tix. A.Ş. Üç Ocak Mah.Turgut Özal Bulvari No: 3/B (Ticaret Borsasi Kompleksi) Merin Türkiye (Turkey)		Pesticide Residue Analysis
FoodChain ID Testing, LLC 4150 Lafayette Center Drive Suite 600 Chantilly, VA 20151		GMO DNA Analysis
USDA-AMS-LATD National Science Laboratories (NSL) 801 Summit Crossing Place, Suite B Gastonia, NC 28054		Pesticide Residue Analysis

QCS may use other commercial labs to conduct testing, as necessitated by testing needs. Any lab used by QCS must meet the qualification requirements of the certification program for which it is being used to test for compliance. Annually, QCS reviews laboratories by ensuring that qualifications are current, and the appropriate confidentiality and conflict of interest agreements are signed by both the laboratory and QCS.

27. Accreditation Body Requirements

The following chart outlines reporting requirements and schedules to QCS's accreditation bodies.

	USDA-NOP	CAEQ-COR	European Commission (or CAEQ as appropriate)	Switzerland Federal Office for Agriculture (FOAG)	Other
Monthly	Compliance actions/Notices – Monthly	Reporting Suspension / Cancellation of organic certification under the Canada Organic Regime 25th of every month	Reporting Suspension / Cancellation of organic certification under the EU compliance program to the CAEQ on the 25th of every month		
As Needed/Occurs		As occurs, within 10 business days, report positive chemical residue samples as per CFIA Directive 14-01.	Changes to any information submitted on application - EC Update of website list of all operators certified organic4F[4] -EC List of clients withdrawing from certification - CAEQ Reports of serious irregularities or suspicion of non-compliances with provisions of the EU 848 - 2018 Compliance	Changes to any information submitted on application Update of website list of all operators certified organic--within 2 weeks of decision Reports of serious irregularities or suspicion of non-compliances with provisions of the Organic Farming Ordinance	

[4] No later than 2 weeks after a decision has been taken and not later than two days after a decision of decertification of an operator has been taken

	USDA-NOP	CAEQ-COR	European Commission (or CAEQ as appropriate)	Switzerland Federal Office for Agriculture (FOAG)	Other
January	Annual List of Certified Operations – Jan.2nd				
February		Annual Information from the CFIA-accredited Certification Bodies			
March			Annual Report due February 28	Annual Report due March 11th	
April	Annual Report – April 29th	Annual Report – February 20th			Annual Report to the CFIA in January

28. Protocol for USDA ARC References[5]

QCS has a valid Certificate of Conformance and may make references to accreditation by the USDA ARC Branch. Methods of communication may be by media, such as via the QCS website or in the QCS Newsletters. References must be complete and not misleading or ambiguous. References must not imply that a product, process, system, or person is approved by the ARC Branch. QCS is responsible for correcting erroneous references in a sufficient manner that is appropriate to the situation. If QCS continuously makes erroneous references, the ARC Branch may not allow QCS to make any references until such time that the ARC Branch is assured that references will be accurate.

[5] ARC Branch Checklist, Section 12.1-12.5

29. Quality Policy Acknowledgement

By signing below, I acknowledge that I understand and commit to the provisions of the QCS Quality Manual and the QCS Personnel Manual.

Signature	Date

Printed Name