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Organization of the  
United Nations



International Federation  
of Organic Agriculture  
Movements



United Nations Conference  
on Trade and Development

INTERNATIONAL TASK FORCE ON HARMONIZATION AND EQUIVALENCE IN ORGANIC AGRICULTURE

## Study and Recommendations for International Requirements for Organic Certification Bodies

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to be discussed at the Workshop on Requirements for Organic Certification, 9 October and the sixth meeting of the International Task Force on Harmonization and Equivalency in Organic Agriculture on October 11<sup>th</sup>, 2006 in Stockholm

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## **1. List of Abbreviations**

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<b>Abbreviation</b>	<b>Full Text</b>
CB	Certification Body
CODEX	Codex Alimentarius Guidelines for the Production, Processing, Marketing and Labeling of Organically Produced Foods
EEC 2992/91	Council Regulation (EEC) No 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs
FAO	Food and Agriculture Organization of the United Nations
GMO	Genetically Modified Organisms
IAC	IFOAM Accreditation Criteria
IBS	IFOAM Basic Standards
ICS	Internal Control System
IFOAM	International Federation of Organic Agriculture Movements
ISO	International Standard Organization
ISO Guide 65	ISO/IEC Guide 65:1996 General Requirements for bodies operating product certification systems
ITF	International Task Force on Harmonization and Equivalence in Organic Agriculture
JAS	Japanese Agricultural Standard
NOP	National Organic Programme, USA
UNCTAD	United Nations Conference on Trade and Development
USDA	United States Department of Agriculture

## 2. Glossary

<b>Term</b>	<b>Definition</b>	<b>Reference</b>	<b>Comment</b>
Accreditation	Procedure by which an authoritative body gives formal recognition that a body or person is competent to carry out specific tasks	ISO	
Certification	Procedure by which a third party gives written assurance that a product, process or service conforms to specified requirements.	ISO	EU regulation for organic production and Codex use the term 'Inspection' instead of the term Certification; terms are used synonymously.
Conformity Assessment	Any activity concerned with determining directly or indirectly that relevant requirements are fulfilled.	ISO	
Equivalence	The acceptance that different standards or technical regulations on the same subject fulfil common objectives.	ITF	
Harmonisation	The process by which standards, technical regulations and conformity assessment on the same subject approved by different bodies establishes inter-changeability of products and processes. The process aims at the establishment of identical standards, technical regulations and conformity assessment requirements.	ITF (WTO modified)	WTO defines "harmonized standards"
Recognition	Arrangement (either unilateral, bilateral, or multilateral) for the use or acceptance of results of conformity assessments.	ITF (ISO modified)	
Requirements for Conformity Assessment	Any procedure or criteria used directly or indirectly to determine that the relevant technical regulations or standards are fulfilled.	ITF (ISO modified)	This could include requirements on the body itself.
Standards	Document approved by a recognized body, that provides for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory. It may also include or deal exclusively with terminology, symbols, packaging, marking or labelling requirements as they apply to a product, process or production method.	WTO/ TBT	Note: The recognized body can be any constituency.
Third Party	The body performing the certification is independent of the supplier as well as of the customer	ISO	

### **3. Executive Summary**

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Based on the previous ITF study “Requirements for Certification – Situation and Scope for Harmonization” and further discussions, this study outlines preliminary recommendations for “International Requirements for Organic Certification Bodies”. They suggest those requirements certification bodies shall meet in order to facilitate international acceptance of certifications bodies’ services in the course of international trade.

The requirements are based on ISO Guide 65 for bodies operating product certification systems. For clarity, additional sector specific explanations are provided. The recommendations propose additional sector specific requirements addressing organic circumstances. Some few ISO Guide 65 requirements are proposed for deletion; some as so called “progress requirements” considering that there are different stages of development of the organic sector in certain areas.

Recommendations will be discussed at an international workshop on requirements for organic certification held in conjunction to the upcoming ITF meeting and during the sixth ITF meeting held in Stockholm in October 2006.

## **4. Background and Objective**

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This Study has been prepared as background document for the International Task Force on Harmonization and Equivalence in Organic Agriculture (ITF)<sup>1</sup>.

The overall objective of the ITF is to facilitate trade of organic products as a response to difficulties faced by organic producers and exporters due to the hundreds of different organic regulations, standards and labels worldwide.

With this study ITF is focusing specifically on requirements that certification bodies must meet in order to get approved or accredited as organic certification bodies. There are several regulatory but also private systems imposing such requirements on organic certification bodies for approval or accreditation. Similar to varying standards, requirements for organic certification bodies also vary. This causes difficulties for certification bodies and finally for organic producers to get organic certified products accepted in different markets.

The ITF therefore aims to develop a common set of International Requirements for Organic Certification bodies in order to facilitate the recognition of certification bodies' services in the course of international trade.

The requirements to be developed are understood as those requirements organic certification bodies must meet in order for their certification services to be recognized in the course of international trade.

This study is based on a previous ITF study, "Requirements for Certification – Situation and Scope for Harmonization", and in addition considers the discussion and results of the ITF Accreditation workshop of 5 December 2005 and the ITF meeting of 6 December, 2005.

Based on the previous work and discussion and a detailed table viewing the existing requirements (see annex 2 of this document), the study drafts preliminary recommendations for essential certification requirements to facilitate further discussion. These preliminary recommendations of the study will be discussed in a workshop on Requirements for Organic Certification 9 October 2006 and during the sixth ITF meeting 11-13 October 2006 in Stockholm.

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<sup>1</sup> International Task Force on Harmonization and Equivalence in Organic Agriculture, convened by FAO, IFOAM, UNCTAD, serves as an open-ended platform for dialogue between private and public institutions involved in trade and regulatory activities in the organic agriculture sector

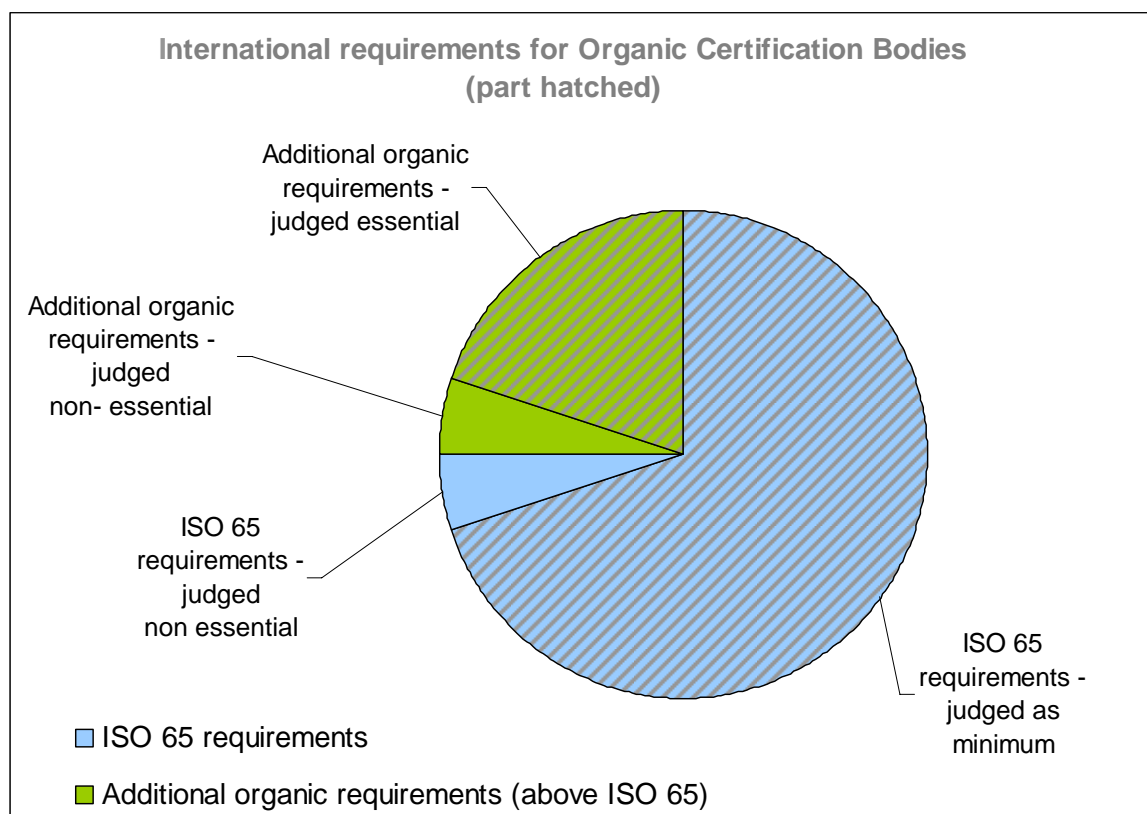
## 5. Concept

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Based on the previous study and discussions, the Terms of Reference of this Study require drafting preliminary recommendations for International Requirements for Organic Certification Bodies. The Requirements shall reflect the minimum requirements that are really necessary for assuring organic integrity. Based on the discussions and findings so far, ITF expects the recommended set of International Requirements to mainly consist of ISO Guide 65 Requirements for Bodies Operating Product Certification Systems, plus a set of essential organic certification requirements. However the ITF also requests to take into account to drop single ISO Guide 65 requirements due to their inappropriateness and/or difficulty to enforce in the case of organic certification. In addition an attempt should be made to recommend flexible requirements for scale and stage of development of certification bodies.

### 5.1. Graphical representation

The following graphic visualizes the structure of the International Requirements for Organic Certification Bodies the ITF aims to develop. Note that the graphic does not necessarily represent the relative percentage of the requirements. Those requirements that go beyond ISO Guide 65 are considered as additional organic requirements (see the green area); they are to be identified based on the analysis of different regulatory and private systems. The blue area represents ISO Guide 65 requirements. Requirements of both areas are assessed against the criteria whether or not they can be considered as essential (or minimum) in order to assure organic integrity.



## 5.2. Areas of requirements (boxes)

Previous discussions in the Workshop on Accreditation and Certification Bodies and the ITF meeting suggest thinking about organic certification requirements as if there are located in boxes<sup>2</sup>.

Three boxes (areas) have been identified; each representing a specific focus organic certification requirements address.

Following boxes have been identified:

- Box 1: the area containing requirements for agricultural production and processing (production standards); relevance to this paper is only to identify certification requirements that should be allocated to the realm of standards for organic agriculture and processing.
- Box 2: the area containing requirements for how organic certification is conducted, e.g. what specific records the certification body must check e.g. grower group inspection requirements, verifying the GMO prohibition. Box 2 requirements are sector specific and more prescriptive, detailing the applicable certification scheme
- Box 3: the area containing requirements for the competency of the certification body (most related to the content of ISO Guide 65).

<sup>2</sup> See the report of the fifth Meeting of the ITF, 5-7 December 2005

The International Requirements for Organic Certification Bodies will include requirements of Boxes 2 and 3. Box 2 contains organic- sector specific requirements; Box 3 mainly relates to ISO Guide 65. Although considered as a separate box, the content of Box 2 cannot be seen independent because it is impacted by Box 3.

Example:

Box 3: See ISO Guide 65,

8.2 Application

8.2.2 The applicant as a minimum shall provide the following information:

a) ....

b) a definition of the products to be certified, the certification system, and the standards against which each product is to be certified if known to the applicant.

Organic certification is a process certification, evaluating and certifying a production method. ISO 8.2 b) requirement translated for organic circumstances, therefore requests applicants to define the production method/process to be certified.

Based on that, organic schemes specify the kind of information an applicant shall submit with its application in order to provide proper definition of the process to be certified. Information provided by the applicant shall enable the certification body to carry out the evaluation.

The three given examples below demonstrate on the one hand how differently the respective Box 3 requirement has been translated to adapt it to organic, and otherwise also show the difference regarding level of specificity and prescription in certification requirements:

See IFOAM Accreditation Criteria (IAC)<sup>3</sup>:

**“Application form**

6.1.2 The certification body shall require completion of an official application form, signed by the applicant. This shall determine at least the following information:

a. The scope of the desired certification.<sup>4</sup>

b. Sufficient information about the production system to enable appropriate assignment of the inspector and proper preparation by the inspector

**Guidance:** This shall include disclosure of denial of organic certification by another certification body. Such a disclosure shall include the reasons for denial.<sup>5</sup>”

See EU Regulation for Organic Production (EEC 2092/91):

“Annex III, 3. Initial inspection

When the inspection arrangements are first implemented the operator responsible must draw up

- a full description of the unit/or premises and/or activity,

- all the practical measures to be taken at the level of the unit and/or premises and/or activity to ensure compliance with this regulation, and in particular with the requirements in this annex.

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<sup>3</sup> IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing, published February 2006 in ‘The IFOAM Norms for Organic Production and Processing, Version 2005’

*Following Explanatory notes belong to the IAC citation above:*

<sup>4</sup> **Explanatory Note 6.1.2a:** This also includes the production and area to be certified, and in cases where the certification body offers more than one certification program, the standards against which the product is to be certified.

<sup>5</sup> **Explanatory Note 6.1.2c:** Regions where there is only one certification body are not considered relevant.

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The description and practical measures concerned must be contained in a declaration, signed by the responsible operator.

.... “

See National Organic Programme (NOP), subpart E

“§ 205.401 Application for Certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(a) An organic production or handling system plan, as required in § 205.200;

(b) The name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf;

§ 205.201 Organic production and handling system plan.

(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;

(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

(3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;

(4) A description of the recordkeeping system implemented to comply with the requirements established in § 205.103;

(5) A description of the management practices and physical barriers established to prevent commingling of organic and non-organic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and

(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.”

### **5.3. Additional conceptual principles**

The discussion and analysis so far indicates that there is a need to address the process certification situation with special organic requirements. These requirements are sector specific different to ISO Guide 65 requirements that are applicable for any third party conformity assessment system regardless of which standard.

However the examples above show how different organic certification requirements are regarding the level of specificity. So the question is how detailed and descriptive common organic system requirements shall be.

It has been expressed that prescriptive details related to inspection audit, review/evaluation and certifying (decision) are adequate for a process certification system. It also has been addressed that Certification bodies are competing with each other, which drives the need for more “specificity” for “fair” competition working under the same conditions.

However it also has been clarified and accepted that generally setting requirements shall be “outcome” based rather than based on specific requirements, which tend to become out of date. The author understood this statement as applicable for all areas (boxes) of certification requirements (not only for setting standards for organic production but also for other requirements applicable for Certification Bodies)<sup>6</sup>.

It is not possible to follow both instructions equally; they are incompatible and contradicting. In order to solve this problem the following approach has been decided for

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<sup>6</sup> See page 21 of the report of the ITF Workshop on Accreditation and Certification Bodies, 5 December 2005 (appendix 1 of the report of the fifth ITF meeting, 5-7 December 2005).

drafting the preliminary recommendations for International Requirements for Organic Certification Bodies:

- Requirements shall be outcome based
- If prescriptive details are included, it shall be based on an assessment of whether a certain requirement including the descriptive details is essential for assuring organic integrity.

The focus on organic integrity generally guides drafting the International Requirements for Organic Certification Bodies. However the term, “organic integrity” is not defined specifically although used commonly. It might be trivial, however the following examples (taken from the (NOP) production standard sections and from IAC) should help to understand and clarify the term.

NOP uses the term in § 205.272 Commingling and contact with prohibited substance prevention practice standard:

(2) The use or reuse of any bag or container that has been in contact with any substance in such a manner as to compromise the organic integrity of any organically produced product or ingredient placed in those containers, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.

IAC uses the term amongst others in section 7.7 Sanction

7.7.3 Where a non-conformity that affects organic integrity is found, the certification body shall require that the certification mark or any other indication of certification is removed from the entire production run or product affected by the non-conformity concerned.

IAC definition section includes following two definitions:

Non-conformity: An instance where a particular standard is not being met

Violation: Breach of requirement other than standards.

Organic integrity refers to the organic production system and the applicable organic production standard an operator shall meet. Organic integrity is affected when operators fail to meet organic standards. By working on the development of “essential organic certification requirements” it has been focused on those sector specific requirements without which conformity to the organic standards cannot be ensured or verified.

It also shall be noted that such an assessment is rather subjective than objective and will be influenced also by cultural, traditional and social conditions.

## **5.4. Flexible requirements considering the stage of development**

### **5.4.1. Rationale**

By developing the International Requirements for Organic Certification Bodies the stage of development of certification bodies should be taken into account. The objective is to allow for some flexibility. ITF specifically targets to facilitate market access, particularly for developing countries and smallholders. It is understood that the request to consider also flexible requirements is targeting areas in which organic is just emerging, where there are

only few operations, low or even no local market development and no actors such as certification bodies.

So the question is whether allowance for flexibility supports the development of local conformity assessment systems and at the same time still facilitates operators to access international markets?

Again it is a question of whether organic integrity can be assured and must therefore be considered very carefully.

See IFOAM Accreditation Criteria<sup>7</sup>:

“The Criteria require that the certification body has an effective quality system in accordance with the relevant elements of the Criteria and which is appropriate for the type, range and volume of work performed. It is recognized that new programs operating in economically less favored areas may have less developed quality systems.”

IAC further lists examples where varying solutions could be applied:

- Where the criteria have clearly been developed for organizations with large numbers of staff or several offices.
- Where the criteria have clearly been developed for certification bodies with large numbers of operators or more complex operations.
- Where the criteria become particularly onerous due to cultural or developmental reasons, such as poor communication systems or low levels of literacy.”

First bullet point addresses complexity of Certification Body’s internal organization; second bullet point addresses number and complexity of operators a certification body is certifying; third bullet point addresses developmental reasons such as lack of infrastructure and literacy.

Neither ISO Guide 65 nor other organic schemes provide for something comparable; there is no experience yet how this is going to be implemented as this has been introduced into IAC only last year.

#### **5.4.2. Minimum and progress requirements**

In order to lower barriers it could be an option to distinguish minimum requirements for which fulfillment shall be demonstrated from the beginning and progress requirements for which continued improvement shall be demonstrated.

A certification body applying for approval or accreditation shall fulfill at least all minimum requirements; it further shall demonstrate that it continuously improves and will reach compliance also with those requirements that are classified as progress requirements.

In order to monitor progress of improvement, a requirement for gradual fulfillment of the progress requirements over a certain time period should be defined.

This concept would lower the requirements to enter into business; it would allow for development and finally it would assure that after a certain development period requirements apply equally.

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<sup>7</sup> See IAC, Page 74, Introduction

However it is difficult to decide the circumstances under which fulfillment of minimum requirements is satisfactory opposed to those circumstances where all requirements apply from the beginning. This needs to be discussed thoroughly.

Based on these theoretical ideas, some proposals for minimum and progress requirements are made in the following chapter 6.

## **6. Preliminary Recommendation for International Requirements for Organic Certification Bodies**

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### **6.1. Introduction to the table**

In the following table preliminary recommendations for International requirements for Organic Certification Bodies are provided. The table follows the structure of ISO Guide 65, it shows ISO Guide 65 numbering and complete ISO Guide text (see the two columns at left (headline “Nr.” and “ISO Guide 65”). The next columns provide for proposed additional “essential” organic requirements in order to safeguard organic integrity (marked with “+ essential organic”, highlighted in green).

The next column includes additional sector specific explanation of the requirements (“sector specific explanation”). The explanation is provided for fostering better understanding on how to translate the sector unspecific ISO Guide 65 requirements for application under organic certification systems.

The column headed with “m/p/d” judges whether the respective requirement is considered minimum (“m”), is introduced as progress requirement (“p”) or proposed for deletion (“d”). The column on the right raises some points for discussion. A m+ indicates that the requirement is considered minimum and is proposed as sector specific requirement in addition to ISO Guide 65 requirements.

Sector specific requirements (most are requirements of box 2) are added following the respective box 3 requirement which is the general competence requirement.

Each added box 2 requirement specifies how certification shall be carried out in order to address specific organic circumstances.

No so called box 3 requirements (competence requirements) have been added.

20 requirements have been added as essential organic requirements, 11 ISO Guide requirements are proposed for deletion; two requirements are proposed for progress requirement each of them containing a list of several sub points.

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**6.2. Table**

<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<i>Points for discussion</i>
<b>1</b>	<b>Scope</b>				
<b>1.1</b>	This Guide specifies general requirements that a third-party operating a product certification system shall meet if it is to be recognized as competent and reliable. In this Guide the term "certification body" is used to cover any body operating a product certification system. The word "product" is used in its widest sense and includes processes and services; the word 'standard' is used to include other normative documents such as specifications or technical regulations.		Organic certification is the certification of a process. Subject to evaluation and certification should be the entire production process/method (entire production chain) and not just the final product.	m	
<b>1.2</b>	The certification system used by the certification body may include one or more of the following, which could be coupled with production surveillance or assessment and surveillance of the supplier's quality system or both, as described in ISO/IEC Guide 53: a) type testing or examination; b) testing or inspection of samples taken from the market or from supplier's stock or from a combination of both,- c) testing or inspection of every product or of a particular product, whether new or already in use; d) batch testing or inspection; e) design appraisal NOTE 1 ISO/IEC Guide 28 may be consulted for a model of one form of a third-party product certification system		The Organic Certification System applies throughout the entire production chain; it should be based on document review and on-site inspection visits in order to verify whether a defined production method standard has been met. Sample analyses may serve as an additional tool for clarifying suspicious facts.	m	Chain of custody: Clarification that the certification system applies throughout the entire chain of custody is added as explanation in the scope area and is taken up again under 10, Evaluation
<b>2</b>	<b>References</b> ...				
<b>3</b>	<b>Definitions</b> For the purposes of this Guide, the relevant definitions given in ISO/IEC Guide 2 and ISO 8402 apply, together with the following definition.			Def.	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<i>Points for discussion</i>
<b>3.1</b>	Supplier: The party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which the certification is based.		Operator: an individual or business enterprise, responsible for ensuring that production meets, and continues to meet, the organic standard on which certification is based. Process/Production Method Standard: A standard that sets out criteria for the processes and/or production methods by which a product is produced.	Def.+	Adding definition of process/production method standard? See definition provided in IAC for “operator” and the ISEAL code that provides a definition of a process/production method standard  Adding of a definition of what constitutes a major non-conformity/compliance versus minor non-conformity? major: a situation which would raise significant doubt as to the conformity of the applicable production method standard; minor: breach of requirements other than standard
<b>4</b>	4 Certification body				
<b>4.1</b>	General Provision				
<b>4.1.1</b>	The policies and procedures under which the certification body operates and their administration shall be non-discriminatory and shall be administered in a non-discriminatory manner. Procedures shall not be used to impede or inhibit access by applicants, other than as provided for in this Guide.			m	
<b>4.1.2</b>	The certification body shall make its services accessible to all applicants whose activities fall within its declared field of operation. There shall not be undue financial or other conditions. Access shall not be conditional upon the size of the supplier or membership of any association or group, nor shall certification be conditional upon the number of certificates already issued.		Regarding financial condition – certification fee structure should be standardized and publicly available on request	m	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<i>Points for discussion</i>
<b>4.1.3</b>	The criteria against which the products of a supplier are evaluated shall be those outlined in specified standards. Requirements for standards suitable for this purpose are contained in ISO/IEC Guide 7. If explanation is required as to the application of these documents for a specific certification system, it shall be formulated by relevant and impartial committees or persons possessing the necessary technical competence, and published by the certification body.		Criteria against which the organic process is evaluated are given in a specified production method standard; see definition of production method standard	m	
<b>4.1.4</b>	The certification body shall confine its requirements, evaluation and decision on certification to those matters specifically related to the scope of the certification being considered.			m	
<b>4.2</b>	<b>Organization</b> The structure of the certification body shall be such as to foster confidence in its certifications. In particular, the certification body shall			m	
<b>a)</b>	be impartial.		This includes fee structure and other issues related to payment; consideration for specific provisions to avoid bribery of the process (e.g. bribe of inspectors) should be made.	m	Is a further explanation to specifically address bribe necessary?
<b>b)</b>	be responsible for decisions relating to its granting, maintaining, extending, suspending and withdrawing of certification			m	

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<b>Nr.</b>	<b>ISO Guide 65</b>	<b>+ essential organic</b>	<b>Sector specific explanation</b>	<b>m/p/d</b>	<b>Points for discussion</b>
c)	<p>identify the management (committee, group or person) which shall have overall responsibility for all of the following:</p> <ol style="list-style-type: none"> <li>1) performance of testing, inspection, evaluation and certification as defined in this Guide,</li> <li>2) formulation of policy matters relating to the operation of the certification body,</li> <li>3) decisions on certification,</li> <li>4) supervision of the implementation of its policies,</li> <li>5) supervision of the finances of the body,</li> <li>6) delegation of authority to committees or individuals as required to undertake defined activities on its behalf,</li> <li>7) technical basis for granting certification</li> </ol>			m	<p>ISO provides for a descriptive list – Can be summarized: <i>Identify the management (body, group or person) which shall have the overall responsibility of the functioning of the certification body, the procedures applied including finances.</i></p> <p>List of 1-7 could go into guidance to clarify what belongs to the overall functioning of the certification system.</p>
d)	have documents which demonstrate it is a legal entity			m	
e)	have a documented structure which safeguards impartiality including provisions to ensure the impartiality of the operations of the certification body; this structure shall enable the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system			m	<p>Stakeholder participation as a means to ensure the impartiality of the activities of the certification body should be established. Affects also conflict of interest provisions!</p>
f)	ensure that each decision on certification is taken by a person(s) different from those who carried out the evaluation			m	
g)	have rights and responsibilities relevant to its certification activities			m	
h)	have adequate arrangements to cover liabilities arising from its operations and/or activities			d	Difficult to enforce anyway
i)	have the financial stability and resources required for the operation of a certification system			m	
j)	employ a sufficient number of personnel having the necessary education, training, technical knowledge and experience for performing certification functions relating to the type, range and volume of work performed, under a responsible senior executive			m	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<i>Points for discussion</i>
<b>k)</b>	have a quality system giving confidence in its ability to operate a certification system for products			m	
<b>l)</b>	have policies and procedures that distinguish between product certification and any other activities in which the certification body is engaged			m	
<b>m)</b>	together with its senior executive and staff, be free from any commercial, financial and other pressures which might influence the results of the certification process			m	
<b>n)</b>	have formal rules and structures for the appointment and operation of any committees which are involved in the certification process; such committees shall be free from any commercial, financial and other pressures that might influence decisions; a structure where members are chosen to provide a balance of interests where no single interest predominates will be deemed to satisfy this provision			m	
<b>o)</b>	ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications, and it shall not 1) supply or design products of the type it certifies, 2) give advice or provide consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification requested, 3) provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions		Explanations regarding the production method standard are not considered as advice or consultancy General information may be given as long as this service is offered to all applicants/operators in a non-discriminatory manner	m	
<b>p)</b>	have policies and procedures for the resolution of complaints, appeals and disputes received from suppliers or other parties about the handling of certification or any other related matters		Appeals are against certification decisions, complaints are related to the performance of the CB itself or certified operators. The appeals procedure should include specific provisions to ensure impartiality of the appeals process, meaning that a person or body responsible for a decision that is being appealed should not be involved in the decision on that appeal.	m	

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4.3	<p>The certification body shall take all steps necessary to evaluate conformance with the relevant product standards according to the requirements of specific product certification system (see clause 3). The certification body shall specify the relevant standards or parts thereof and any other requirements such as sampling, testing and inspection requirements which form the basis for the applicable certification system.</p> <p>In conducting its certification operations, the certification body shall observe, as appropriate, the requirements for the suitability and competence of body (ies) or person(s) carrying out testing, inspection and certification/registration as specified in ISO/IEC Guides 25, 39 and 62.</p>			m	
		The CB shall specify any other certification requirements such as documentation, reporting and inspection requirements and if applicable sampling and testing requirements.		m+	Adapted to the procedures organic certification applies
4.4	<p>Subcontracting</p> <p>When a certification body decides to subcontract work related to certification (e.g. testing or inspection) to an external body or person, a properly documented agreement covering the arrangements including confidentiality and conflict of interest shall be drawn up. The certification body shall</p>			m	
a)	<p>take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification</p>			m	

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<b>b)</b>	ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing, inspection or other technical activities (see clause 2), and is not involved either directly or through the person's employer with the design or production of the product in such a way that impartiality would be compromised		As long as the subcontracted body is subject to criteria deemed to be equal competency is ensured	m	
<b>c)</b>	obtain the applicant's consent.			d	Delete: as long as the operation is informed with the application that e.g. inspection is subcontracted, the specific requirement to obtain applicant's consent specifically related to this point is not necessary
	<p>NOTES</p> <p>2 Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) and satisfy itself regarding the matters detailed in 4.4 b) -</p> <p>3 The requirements given in 4.4 a) and b) are also relevant, by extension, when a certification body uses, for granting its own certification, work performed by another certification body with which it has signed an agreement.</p>				Chain of custody is addressed under 1 scope and 10. Evaluation.
<b>4.5</b>	<b>Quality System</b>				
<b>4.5.1</b>	The management of the certification body having executive responsibility for quality shall define and document its policy for quality and its objectives for, and commitment to, quality. The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization.			m	

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4.5.2	<p>The certification body shall operate an effective quality system in accordance with the relevant elements of this Guide and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available for use by the certification body staff. The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. The certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for</p> <p>a) ensuring that a quality system is established, implemented and maintained in accordance with this Guide, and</p> <p>b) reporting on the performance of the quality system to the body's management for review and as a basis for improvement of the quality system.</p>			m	

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4.5.3	<p>The quality system shall be documented in a quality manual and associated quality procedures, and the manual shall contain or refer to at least the following:</p> <ul style="list-style-type: none"> <li>a) a quality policy statement;</li> <li>b) a brief description of the legal status of the certification body, including the names of its owners and, if different, names of the persons who control it;</li> <li>c) the names, qualifications, experience and terms of reference of the senior executive and other certification personnel, both internal and external;</li> <li>d) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive;</li> <li>e) a description of the organization of the certification body, including details of the management (committee, group or person) identified in 4.2 c), its constitution, terms of reference and rules of procedure;</li> <li>f) the policy and procedures for conducting management reviews.</li> <li>g) administrative procedures including document control;</li> <li>h) the operational and functional duties and services pertaining to quality, so that the extent and limits of each person's responsibility are known to all concerned;</li> <li>i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance;</li> <li>j) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;</li> <li>k) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken;</li> <li>l) the procedures for evaluating products and implementing the certification process, including <ul style="list-style-type: none"> <li>1) the conditions for issue, retention and withdrawal of certification documents,</li> <li>2) controls over the use and application of documents employed in the certification of products;</li> </ul> </li> <li>m) the policy and procedure for dealing with appeals, complaints and disputes;</li> <li>n) its procedures for conducting internal audits, based on the provisions of ISO 1 001 1 -1.</li> </ul>		<p>See i) Training procedures should distinguish between initial (including onsite apprenticeship period for new inspectors) and ongoing training for staff involved in certification;</p> <p>See i) the procedure to monitor performance should include periodical witness audits of inspectors work.</p> <p>See l)1) the certification body should have a documented range of sanctions including measures to deal with minor nonconformities</p>	p	<p>Proposed for progress requirement: Depending on type, range and volume performed, a certification body starting shall have at least the following documented procedures for:</p> <ul style="list-style-type: none"> <li>- training of certification body personnel and monitoring of their performance (i)</li> <li>- handling non-conformities and for assuring effectiveness of corrective actions (k)</li> <li>- for evaluating the production method/ process and implementing the certification process (including application, preparation of inspection, on-site inspection procedures, sampling, reporting and taking the certification decision. The latter includes issuing of sanctions such as corrective actions, retention, and withdrawal of certification documents. (l)</li> <li>- dealing with appeals (m)</li> <li>- to ensure continuous quality improvement (internal audits) (n)</li> </ul> <p>Documents are part of the Quality Manual documentation of a certification body that shall be completed referring to at least a)-n) latest within 5 years.</p>

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<b>4.6</b>	<b>Conditions and procedures for granting, maintaining, extending, suspending and withdrawing certification.</b>				
<b>4.6.1</b>	The certification body shall specify the conditions for granting, maintaining and extending certification and the conditions under which certification may be suspended or withdrawn, partially or in total			m	
<b>4.6.2</b>	The certification body shall have procedures to a) grant, maintain, withdraw and, if applicable, suspend certification., b) extend or reduce the scope of certification., c) re-evaluate, in the event of changes significantly affecting the product's design or specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system.			m	.
		Additional organic requirement: The certification body shall have procedures to d) impose sanctions or corrective actions e) monitor implementation of corrective actions imposed including timelines set. f) grant exceptions, if applicable. g) prevent any misleading claims as with regard to the status of certification in case major-nonconformities are found		m+	See also IAF guidance to clause 4.6, misleading claims and product recall.
<b>4.7</b>	<b>Internal audits and management reviews</b>				
<b>4.7.1</b>	The certification body shall conduct periodic internal audits covering all procedures in a planned and systematic manner, to verify that the quality system is implemented and is effective.		Findings of the performance reviews conducted periodically are part of the internal audit	p	<i>Proposed for progress review specified as:</i> The extent of internal audits and management reviews depend on type, range and volume performed: it shall be demonstrated that the CB seeks for and achieves continuous quality improvement.

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<b>4.7.2</b>	The body's management with executive responsibility shall review its quality system at defined intervals which are sufficiently short to ensure its continuing suitability and effectiveness in satisfying the requirements of this Guide and the stated quality policy and objectives. Records of such reviews shall be maintained.			p	see comment above
<b>4.8</b>	<b>Documentation</b>				
<b>4.8.1</b>	The certification body shall provide (through publications, electronic media or other means), update at regular intervals, and make available on request, the following a) information about the authority under which the Certification body operates; b) a documented statement of its product certification system, including its rules and procedures for granting, maintaining, extending, suspending and withdrawing certification; c) information about the evaluation procedures and certification process related to each product certification system; d) a description of the means by which the organization obtains financial support and general information on the fees charged to applicants and to suppliers of certified products; e) a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted. f) information about procedures for handling complaints, appeals and disputes; g) a directory of certified products and their suppliers.		b) specifies the following: - the production method standard(s) for which certification is granted - sanctions that will be applied in case non-conformities are found. - the fee structure g) includes the following information: - list of certified operators including the scope for which certification is granted (e.g. processing, grower group)	m	

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<b>4.8.2</b>	The certification body shall establish and maintain procedures to control all documents and data that relate to its certification functions. These documents shall be reviewed and approved for adequacy by appropriately authorized and competent personnel prior to issuing any documents following initial development or any subsequent amendment or change being made. A listing of all appropriate documents with the respective issue and/or amendment status identified shall be maintained. The distribution of all such documents shall be controlled to ensure that the appropriate documentation is made available to personnel of the certification body or suppliers when they are required to perform any function relating to the certification body's activities.			m	
<b>4.9</b>	Records				
<b>4.9.1</b>	The certification body shall maintain a record system to suit its particular circumstances and to comply with existing regulations. The records shall demonstrate that the certification procedures have been effectively fulfilled, particularly with respect to application forms, evaluation reports, surveillance activities and other documents relating to granting, maintaining, extending, suspending or withdrawing certification. The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. The records shall be kept for a period of time so that continued confidence may be demonstrated for at least one full certification cycle, or as required by law.		Operator records shall be up to date and contain all relevant information, including inspection reports and certification history.	m	
		<ul style="list-style-type: none"> <li>- Separate records shall be kept for exceptions granted.</li> <li>- Records shall be kept for a period not less than the period of conversion requested + one full production cycle.</li> </ul>		m+	

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4.9.2	The certification body shall have a policy and procedures for retaining records for a period consistent with its contractual, legal or other obligations. The certification body shall have a policy and procedures concerning access to these records consistent with 4.10.1 <b>NOTE 4</b> The question of the length of time for retention of records requires specific attention in the light of legal circumstances and recognition arrangements.	-		m	
4.10	<b>Confidentiality</b>				
4.10.1	The certification body shall have adequate arrangements consistent with applicable laws to safeguard confidentiality of the information obtained in the course of its certification activities at all levels of its organization, including committees and external bodies or individuals acting on its behalf.			m	
4.10.2	Except as required in this Guide or by law, information gained in the course of certification activities about a particular product or supplier shall not be disclosed to a third-party without the written consent of the supplier. Where the law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided as permitted by the law.			m	
	<b>Information exchange excluded from confidentiality requirements</b>				
		In case of serious suspicion that a production method standard has been violated throughout the chain of custody, information between certification bodies may be exchanged without written consent of the operator concerned in order to verify the case.		m+	
		In case of dual or multiple certifications within the same scope, provisions between certification bodies shall be taken, including information exchange, in order to prevent misuse of certificates.		m+	

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<b>5.</b>	<b>Certification body personnel</b>				
<b>5.1</b>	General				
<b>5.1.1</b>	The personnel of the certification body shall be competent for the functions they perform, including making required technical judgements, framing policies and implementing them.			m	
<b>5.1.2</b>	Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. These instructions shall be maintained up to date.			m	
<b>5.2</b>	<b>Qualification criteria</b>				
<b>5.2.1</b>	In order to ensure that evaluation and certification are carried out effectively and uniformly, the minimum relevant criteria for the competence of personnel shall be defined by the certification body.			d	Can be deleted, see 5.2.3
<b>5.2.2</b>	The certification body shall require its personnel involved in the certification process to sign a contract or other document by which they commit themselves a) to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interest; and b) to declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are to be assigned. The certification body shall ensure that, and document how, any contracted personnel for their own part, and on the part of their employer if any, satisfy all the requirements for personnel outlined in this Guide.		This can be covered in a working contract; Declarations of any prior or present association shall be updated regularly	m	

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		All persons that have declared an association that constitutes a conflict of interest situation shall be excluded from work, discussion and decisions in all stages of the certification process related to the potential conflict. The exclusion of such persons shall be recorded in minutes or other records.		m+	
5.2.3	Information on the relevant qualifications, training and experience of each member of the personnel involved in the certification process shall be maintained by the certification body. Records of training and experience shall be kept up to date, in particular the following: a) name and address; b) organization affiliation and position held; c) educational qualification and professional status. d) experience and training in each field of the certification body's competence; e) date of most recent updating of records-, f) performance appraisal.	.		d	See proposal in next line below as replacement
		Records of training and experience shall be kept, demonstrating that evaluation and certification personnel has and continues to have the technical knowledge and experience for performing certification functions.		m+	ISO 5.2.3 is a too descriptive requirement; should focus on the “outcome” – to ensure that personnel is experienced to carry out their tasks.
<b>6.</b>	<b>Changes in the certification requirements</b>				
	The certification body shall give due notice of any changes it intends to make in its requirements for certification. It shall take account of views expressed by interested parties before deciding on the precise form and effective date of the changes. Following decision on, and publication of, the changed requirements, it shall verify that each supplier makes any necessary adjustments within such time as, in the opinion of the certification body, is reasonable.			d	Replaced by the following (see next line below)

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		The certification body shall ensure each operator to be notified of any changes in the certification requirements without unnecessary delay. It shall verify the operator's implementation of such change in a timely manner, considering the given implementation periods.		m+	Stakeholder involvement is already covered in 4.2.e
<b>7.</b>	<b>Appeals, complaints and disputes</b>				
<b>7.1</b>	Appeals, complaints and disputes brought before the certification body by suppliers or other parties shall be subject to the procedures of the certification body.			m	
<b>7.2</b>	Each certification body shall <ul style="list-style-type: none"> <li>a) keep a record of all appeals, complaints and disputes and remedial actions relative to certification;</li> <li>b) take appropriate subsequent action;</li> <li>c) document the action taken and its effectiveness</li> </ul>			m	
<b>8.</b>	<b>Application for Certification</b>				
<b>8.1</b>	<b>Information on the procedure</b>				
<b>8.1.1</b>	The certification body shall provide to applicants an up-to-date detailed description of the evaluation and certification procedures, appropriate to each certification scheme, and the documents containing the requirements for certification, the applicants' rights and duties of suppliers which have certified products (including fees to be paid by applicants and suppliers of certified products).		This includes at least the applicable production method standard or the relevant parts thereof, an adequate description of the inspection, certification and appeals procedure, possible sanctions and contractual requirements e.g. fee schedule	m	

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8.1.2	<p>The certification body shall require that a supplier</p> <ul style="list-style-type: none"> <li>a) always complies with the relevant provisions of the certification programme;</li> <li>b) makes all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;</li> <li>c) makes claims regarding certification only in respect of the scope for which certification has been granted;</li> <li>d) does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification which the certification body may consider misleading or unauthorized;</li> <li>e) upon suspension or cancellation of certification, discontinues its use of all advertising matter that contains any reference thereto and returns any certification documents as required by the certification body;</li> <li>f) uses certification only to indicate that products are certified as being in conformity with specified standards;</li> <li>g) endeavours to ensure that no certificate or report nor any part thereof is used in a misleading manner;</li> <li>h) in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of the certification body.</li> </ul>		<p>Necessary arrangements for conducting the evaluation include provisions that the operator shall provide access also to non-organic parts or areas of its operations if relevant.</p>	m	
8.1.3	<p>When the desired scope of certification is related to a specific system or type of system operated by the certification body, any explanation needed shall be provided to the applicant.</p>		<p>An example for a specific system or type of system may be group certification or certification of wild collection</p>	m	

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<b>8.1.4</b>	If requested, additional application information shall be provided to the applicant.			d	Does not add anything?? Compare with 8.1.1 and 8.1.3; to answer questions is part of the service mentality each CB has, but should not be a requirement. ???
<b>8.2</b>	<b>The application</b>				
<b>8.2.1</b>	The certification body shall require completion of an official application form, signed by a duly authorized representative of the applicant, in which or attached to which are the following: a) the scope of the desired certification. b) a statement that the applicant agrees to comply with the requirements for certification and to supply any information needed for evaluation of products to be certified.			m	
<b>8.2.2</b>	The applicant, as a minimum, shall provide the following information: a) corporate entity, name, address and legal status; b) a definition of the products to be certified, the certification system, and the standards against which each product is to be certified if known to the applicant.		b) Definition of the products to be certified herewith means definition of the production system in place to enable appropriate verification of compliance with the production method standard.	m	See additional requirement proposed below
		The applicant shall provide information, records and documentation as specified by the CB that enables evaluation of the production process to be certified.		m+	
<b>9.</b>	<b>Preparation of evaluation</b>				

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9.1	Before proceeding with the evaluation, the certification body shall conduct, and maintain records of, a review of the application for certification to ensure that a) the requirements for certification are clearly defined, documented and understood; b) any difference in understanding between the certification body and the applicant is resolved., and c) the certification body has the capability to perform the certification service with respect to the scope of the certification sought and, if applicable, the location of the applicant's operations and any special requirements such as the language used by the applicant.			d	See instead organic requirement proposed below
		Before scheduling the inspection, the certification body shall review the application documents to ensure that - documents are complete and significant - the applicant will be able to comply with the applicable production method standard - it has the capability to perform the certification service with respect to the scope of the certification sought		m+	It may also be a sector specific explanation to 9.1
9.2	The certification body shall prepare a plan for its evaluation activities to allow for the necessary arrangements to be managed.			d	Not necessary as operator specific plan because evaluation procedures have to be communicated in general anyway. See also proposed additional requirements under 10 Evaluation
9.3	The certification body shall assign personnel appropriately qualified to perform the tasks for the specific evaluation. Personnel shall not be assigned if they have been involved in, or been employed by a body involved in, the design, supply, installation or maintenance of such products in a manner and within a time period which could conflict with impartiality.			m	

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9.4	To ensure that a comprehensive and correct evaluation is carried out, the personnel involved shall be provided with the appropriate working documents.		.	m	
		Inspector shall be informed about non-compliances and corrective actions issued previously to enable the inspector to verify whether they have been implemented		m+	Could be also sector specific explanation added to 9.4?
10.	<b>Evaluation</b> The certification body shall evaluate the products of the applicant against the standards covered by the scope defined in its application against all certification criteria specified in the rules of the scheme.		The certification body evaluates the production method/process implemented by the operator against the applicable production method standard specified. The evaluation includes a document review and an on-site inspection visit in order to verify whether the production process meets the standard.	m	
		The certification body shall evaluate standard compliance already during applicable conversion period. Exceptions shall only be made based on undisputable evidence that standards have been met verified by an on-site inspection visit		m+	Could be added as sector specific explanation under 10?
		Measures shall be taken to verify that standards are met during the entire production process (production chain). If during the production process different certification bodies are involved measures shall be taken such as exchange of information in order to safeguard organic integrity.		m+	

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		In order to verify standard compliance the inspection shall follow a specific protocol to facilitate nondiscriminatory and objective inspection procedure.	Depending on the organic production system evaluate, inspection protocol should include: a. assessment of production or processing system by means of visits to facilities, fields, and storage units; (this may include visits to non-organic areas as well) b. verification of the most recent information provided c. identification and investigation of any risks that might threaten organic integrity d. review of records and accounts; e. production/sales reconciliation on farms; f. an input/output reconciliation and trace back audits in processing and handling; g. interviews with responsible persons including an exit interview; h. verification that changes that have taken place in the standards and requirements of the certification body have been effectively implemented i. residue sampling in accordance with the certification body's sampling policy; j. verification that previously imposed conditions have been fulfilled	m+	
	<b>Specific circumstances</b>	When split and/or parallel production occurs, the certification body shall have appropriate requirements and inspection regimes to safeguard that the products are not mixed or contaminated.	Split production: Production, handling or processing of conventional, in conversion and/or organic in the same unit; Parallel production: production of the same product at the same time in non-certified and certified quality.	m+	

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	<b>Prohibited substances</b>	The certification body shall implement a system to inspect and verify that prohibited substances are not used as specified in the applicable standards.	Verification should be based on a risk assessment. It applies also for the verification of the use of genetically engineered organism and may include testing if appropriate.	m+	
	<b>Specific scope</b>	If specific certification scope is implemented and evaluated such as certification of wild collection or group certification, measures shall be taken to safeguard proper verification of standard compliance.		m+	
<b>11.</b>	<b>Evaluation report</b> The certification body shall adopt reporting procedures that suit its needs but, as a minimum, these procedures shall ensure that a) personnel appointed to evaluate the conformance of the products shall provide the certification body with a report of findings as to the conformity with all the certification requirements. b) a full report on the outcome of the evaluation is promptly brought to the applicant's notice by the certification body, identifying any nonconformities that have to be discharged in order to comply with all of the certification requirements and the extent of further evaluation or testing required. If the applicant can show that remedial action has been taken to meet all the requirements within a specified time limit, the certification body shall repeat only the necessary parts of the initial procedure.			m	Note: regarding b) second sentence: Where to address that an operator can take immediate action in order to meet all requirements? It is proposed to provide further explanation under 12. Decision of certification in order to clarify that issuing of "corrective actions" may be followed by either withholding of certification documents until there is a proof that corrective actions are implemented or issuing certification documents.

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		Inspection reports shall follow a decided format to facilitate a non-discriminatory, objective and comprehensive analysis of the production system. The report includes - comprehensive information as to conformity with the production method standard - a risk assessment with regard to loss of organic integrity The report further indicates - date and duration of the inspection - persons interviewed, - fields and facilities visited - type of documents reviewed (input/output, yield/sales, trace back) and		m+	
<b>12.</b>	<b>Decision on Certification</b>				
<b>12.1</b>	The decision as to whether or not to certify a product shall be taken by the certification body on the basis of the information gathered during the evaluation process and any other relevant information		The evaluation process consists of document review and an onsite inspection. New applicants shall be inspected before certification can be issued.	m	
		The certification decision may include requirements for the correction of minor non-compliances within a specified time period; in case of major non-compliances, issuing of certificate may be withheld until implementation of corrective actions can be demonstrated. In serious cases certification may be denied or cancelled	A certification decision can also include a decision related to a specified area of an operation; e.g. denial of certification of a specified field or product for which major non-compliances are found	m+	See paragraph 3, definitions: proposing to add definitions of major and minor non-compliances.

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Nr.	ISO Guide 65	+ essential organic	Sector specific explanation	m/p/d	Points for discussion
		In order to keep the whole process transparent, reasons for denial, withdrawal or suspension of certification shall be clearly stated. In case corrective actions are issued reference shall be made to the applicable standard or certification requirement.		m+	
		If exceptions are granted there shall be criteria and procedures for granting exceptions. Exceptions shall be clearly limited in time and the rationale for any exception shall be properly recorded		m+	
12.2	The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body.			m	
12.3	The certification body shall provide to each supplier offering certified products, formal certification documents such as a letter or a certificate signed by an officer who has been assigned such responsibility. These formal certification documents shall permit identification of the following: a) the name and address of the supplier whose products ' are the subject of certification; b) the scope of the certification granted, including, as appropriate, 1) the products certified, which may be identified by type or range of products, 2) the product standards or other normative documents to which each product or product type is certified, 3) the applicable certification system; c) the effective date of certification, and the term of the certification if applicable.			m	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<i>Points for discussion</i>
12.4	In response to an application for amendment to the scope of a certificate already granted, the certification body shall decide what, if any, evaluation procedure is appropriate in order to determine whether or not the amendment should be made and shall act accordingly.			m	
13	<b>Surveillance</b>				
13.1	The certification body shall have documented procedures to enable surveillance to be carried out in accordance with the criteria applicable to the relevant certification system.		This includes that operators are re-evaluated periodically to verify whether the operator continues to comply with the standard	m	Is it necessary to determine minimum inspection frequency???
		Operators shall be re-evaluated and inspected periodically in order to verify continuous standard compliance. The frequency shall take into account the risk or threat to organic integrity of the production or products. Surveillance procedures shall include unannounced on site inspections of operators certified, chosen randomly and/or chosen based on risk assessment.		m+	
		Mechanism shall be in place for the effective monitoring whether corrective actions are implemented		m+	
13.2	The certification body shall require the supplier to inform it about any of the changes cited in 4.6.2 c), such as intended modification to the product, manufacturing process or, if relevant, its quality system, which affect the conformity of the product. The certification body shall determine whether the announced changes require further investigations. If such is the case, the supplier shall not be allowed to release certified products resulting from such changes until the certification body has notified the supplier accordingly.			m	
13.3	The certification body shall document its surveillance activities.			m	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<b>Points for discussion</b>
13.4	Where the certification body authorizes the continuing use of its mark on products of a type which have been evaluated, the certification body shall periodically evaluate the marked products to confirm that they continue to conform to the standards.			d	Addressed under 13.1 and the proposed first essential organic requirement.
		Operators shall be kept informed about the outcome of the surveillance and their certification status		m	
14	<b>Use of licences, certificates and marks of conformity</b>		Chapter may be applicable for circumstances in which the certification body does not own the certification mark but is entitled to exercise surveillance about proper use of marks of conformity.		
14.1	The certification body shall exercise proper control over ownership, use and display of licences, certificates and marks of conformity			m	
14.2	Guidance on the use of certificates and marks permitted by the certification body may be obtained from ISO/IEC Guide 23.			d	
14.3	Incorrect references to the certification system or misleading use of licences, certificates or marks, found in advertisements, catalogues, etc., shall be dealt with by suitable action.  <b>NOTE 5</b> Such actions are addressed in [ISO/IEC Guide 27 and can include corrective action, withdrawal of certificate, publication of the transgression and, if necessary, other legal action.			m	

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<i>Nr.</i>	<i>ISO Guide 65</i>	<i>+ essential organic</i>	<i>Sector specific explanation</i>	<i>m/p/d</i>	<b>Points for discussion</b>
<b>15</b>	<p><b>Complaints to suppliers</b>            The certification body shall require the supplier of certified products to</p> <ul style="list-style-type: none"> <li>a) keep a record of all complaints made known to the supplier relating to a product's compliance with requirements of the relevant standard and to make these records available to the certification body when requested;</li> <li>b) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification;</li> <li>c) document the actions taken.</li> </ul>			d	



## Annex 1: Terms of Reference

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Food and Agriculture  
Organization of the  
United Nations



International Federation  
of Organic Agriculture



United Nations  
Conference

INTERNATIONAL TASK FORCE ON HARMONIZATION AND EQUIVALENCE IN ORGANIC AGRICULTURE

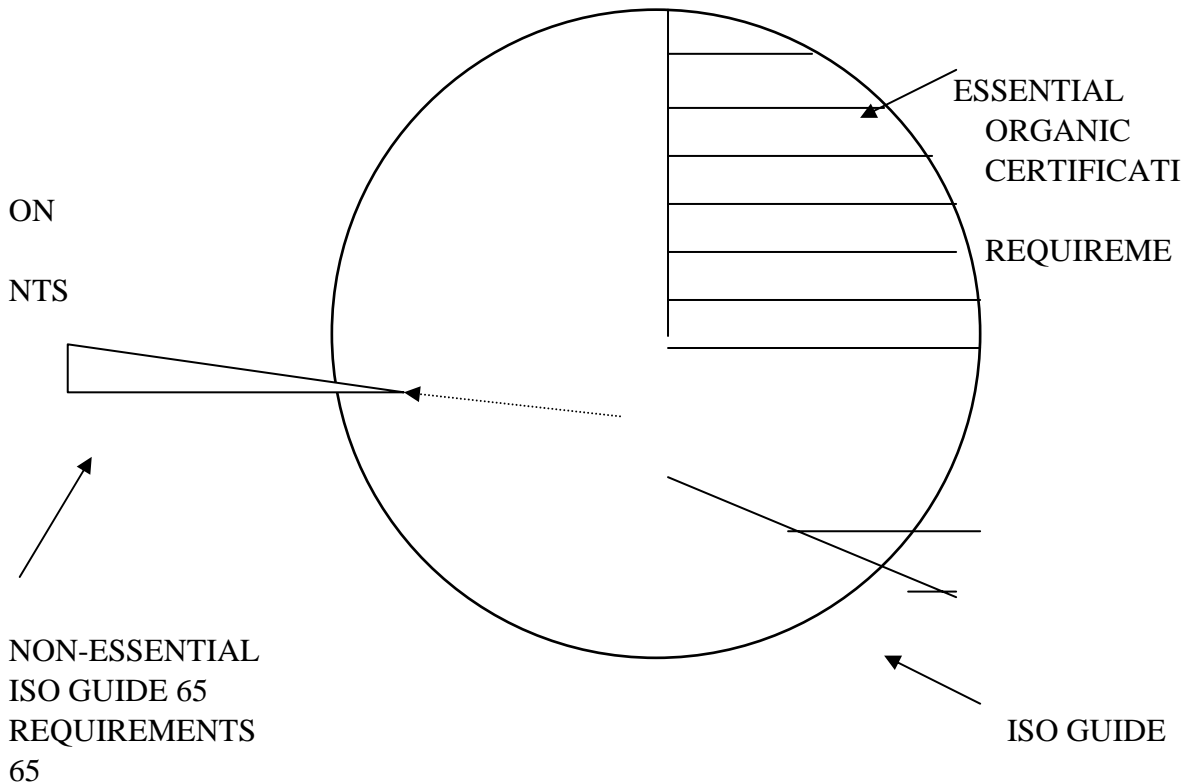
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## Terms of Reference For an ITF Study and Recommendation on International Requirements for Organic Certification Bodies

The International Task Force on Harmonization and Equivalence in Organic Agriculture (ITF) is interested in developing a common set of International Requirements for Organic Certification Bodies, which are those requirements that certification bodies must meet in order for their certification services to be recognized in the course of international trade. The set of International Requirements expected to consist of the ISO Guide 65 Requirements for Bodies Operating Product Certification Systems, plus a set of essential organic certification requirements developed through the ITF process. This project aims to develop the essential organic certification requirements. The project will also recommend if the International Requirements for Organic Certification Bodies should drop any ISO 65 requirements due to their inappropriateness and/or difficulty to enforce in the case of organic certification.

A graphical representation for the structure that ITF aims to develop:

### INTERNATIONAL REQUIREMENTS FOR ORGANIC CERTIFICATION BODIES



Note that this graphic does not necessarily represent the relative percentage of the requirements, but only the concept.

#### Process for Developing the Study and Recommendations

The Study and Recommendations for International Requirements for Organic Certification Bodies will be based upon a previous ITF Study, “Requirements for Certification – Situation and Scope for Harmonization,” and on the discussion and results of the ITF Accreditation Workshop of 5 December, 2005 and the ITF meeting of 6 December, 2005. The new work should a) identify the existing requirements in detail (in table format) and b) draft preliminary recommendations for essential certification requirements and non-essential

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ISO Guide 65 requirements, which will be prepared by 1 August, 2006. The consultant should attempt to provide flexible requirements for scale and stage of development of certification bodies. The draft Study and Recommendations will be presented at the second ITF Workshop on Certification Requirements on 9 October, 2006. Results of that workshop will be incorporated into a Recommendation to the ITF and discussed at the ITF meeting starting on 11 October, 2006.

The document will be considered a first draft of requirements that will continue to be worked on.

It should reflect minimum requirements.

## Annex 2: Comparison table of the existing requirements

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### Introduction to the table (table is added as separate excel file)

Table includes following organic regulatory/voluntary programs:

ISO Guide 65

IFOAM Accreditation Criteria

Requirements of the National Organic Programme (NOP)

Codex Alimentarius Guideline

JAS Law

The table follows ISO 65 structure; it includes full ISO Guide 65 text; followed by respective text of the other regulations addressing the same/ similar issues.

Please consider that the documents compared are heterogeneous. The information included in the table might be difficult to understand because sometimes text is taken out of the context of the respective document.

Any evaluation and judgment whether requirements provided go beyond requirements compared to requirements provided in another documents shall be seen based on the overall context and structure of the respective requirement.

*Note:*

*Conducting a technical comparison of the requirements is a challenge because documents are heterogeneous in structure and terminology.*

Table of requirements for organic certification bodies

	A	B	C	E	F
1	Topic/Category	respect. rule or regulation	corresponding ref	relevant text	Comment/Evaluation of differences
2	Title/Reference				
3		ISO/IEC Guide 65:1996	Title	General requirements for bodies operating product certification systems (ISO/IEC Guide 65: 1996)	scope includes any "product certification system"; there is no reference regarding the standard which is used for certification
4		Ifoam AC	Title	Ifoam Accreditation Criteria for bodies certifying Organic Production and Processing (approved 07/2005, published 02/2006)	scope is limited to bodies "certifying Organic Production and Processing"; the applicable certification standards used shall at least the Ifoam Basic standards.
5		EU regulation	Title of the entire document; + reference where requirements for CBs can be found	Council regulation (EEC) NO 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs; the inspection system is referred to in Article 8,9 and in addition in annex III: Minimum Inspection requirements and precautionary measures under the inspection scheme referred to in Articles 8 and 9.	scope of the regulation is limited to "organic production of agricultural products" as defined in annex 1, for products imported from "third countries" special requirements apply in order to safeguard "equivalency"
6		Codex Guideline		CODEX Alimentarius Organically Produced Foods Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL32-1999, Rev. 1-2001) see Section 6: Inspection and Certification Systems and Annex 3 Minimum Inspection Requirements and Precautionary Measures under th Inspection or Certification System	
7		NOP	Title Introduction	National Organic Program ... This national program will facilitate domestic and international marketing of fresh and processed food that is organically produced and assure consumers that such products meet consistent, uniform standards. This program establishes national standards for the production and handling of organically produced products, including a National List of substances approved for and prohibited from use in organic production and handling. This final rule establishes a national-level accreditation program to be administered by AMS for State officials and private persons who want to be accredited as certifying agents. Under the program, certifying agents will certify production and handling operations in compliance with the requirements of this regulation and initiate compliance actions to enforce program requirements. ...	NOP includes requirements for a national level accreditation program for certification agencies that certify operations meeting the requirements of this regulation; same requirements apply for imported products; foreign certifiers apply for accreditation equally as domestic certification agents.
8		JAS	Note:	JAS Law has been revised and become effective on March 1, 2006 Regarding the Approval / Registration of Certifying Inspection bodies: the key amendment of the JAS law: - transforms registered Certifying bodies to private sector third-party organizations	
9	Scope/ Introduction				
10		ISO/IEC Guide 65:1996	Introduction	... The requirements contained in this Guide are written, above all, to be considered as general criteria for organizations operating product certification systems; they may have to be amplified when specific industrial or other sectors make use of them, or when particular requirements such as health and safety have to be taken into account. ....	
11		Ifoam AC	Introduction	The Criteria require that the certification body has an effective quality system in accordance with the relevant elements of the Criteria and which is appropriate for the type, range and volume of work performed. It is recognized that new programs, and programs operating in economically less favored areas may have less developed quality systems. It is also recognized that cultural, traditional and social conditions may result in varying solutions. Some example of situations where maybe varying solutions could be applied are:	Compared to ISO, IAC grants possibility for "varying solutions": Based on the conditions specified in the following the accreditor may accept that CBs do not implement specific requirements whereas ISO foresees requirements to be amplified only!

Table of requirements for organic certification bodies

	A	B	C	E	F
12		IAC text continuation		<ul style="list-style-type: none"> <li>Where the criteria have clearly been developed for organizations with large numbers of staff or several offices.</li> <li>Where the criteria have clearly been developed for certification bodies with large numbers of operators or more complex operations.</li> <li>Where the criteria become particularly onerous due to cultural or developmental reasons, such as poor communication systems or low levels of literacy.</li> </ul> <p>Regulations or other official demands may also make it difficult or even illegal to fulfill a certain criterion. In such cases it is the prerogative of the accreditation body to determine the acceptability of the certification body's alternative solution, based on whether the integrity of organic production and certification is maintained, and whether the purpose of the specific criterion is met.</p>	
13		EU regulation	Labeling, Article 5, 1.c	1. The labeling and advertising of a product specified in article 1 may refer to organic production methods only where: ... c. the product was produced or imported by an operator who is subject to the inspection measures laid down in Articles 8 and 9;	document introduces an inspection system, but does not specifically provide for requirements for certification bodies. It establishes the system and arrange duties between Member States, a designated approval/supervisory body and the inspection body or authority. (see article 9); it also regulated how imports from so called "third countries" may enter the EU market.
14			Article 9, 11.	Article 9, 11. ... approved inspection bodies must satisfy the requirements laid down in the conditions of standard EN 45011	EU Regulations refers to EN 45011 in its entirety; CBs have to demonstrate satisfaction of the requirements to designated competent authority. <i>Note: to demonstrate satisfaction does not mean formal accreditation carried out by an ISO 65 accredited</i>
15			<i>note</i>	<i>in the following only those EU requirements are included going beyond ISO Guide 65/EN45011</i>	
16		Codex Guideline	Section 6: Inspection and Certification Systems	6.1 Inspection and Certification systems are used to verify the labelling of, and claims for, organically produced foods. Development of these systems should take into account the Principles for Food Import and Export Inspection and Certification, the Guideline for the Design, operating, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems.(17) <i>Footnote Nr. 17: see also other agreed international standards, eg ISO 65</i>	Document introduces the inspection and certification system and refers to ISO 65 for the development of such a system.
17				6.2 Competent authorities should establish an inspection system operated by one or more designated authorities and/or officially recognized inspection/certification bodies (18) ..... <i>Footnote 18: In organic approval processes reference is frequently made to certification performed by either a 'certification body' or an 'inspection body'. Where such functions are conducted by the same body there must be clear separation of the inspection and certification roles</i> 6.3 The officially recognized inspection and certification systems should comprise at least the application of the measures and other precautions set out in Annex 3 6.4 For the application of the inspection system operated by the official or officially recognized certification body or authority, countries should identify a competent authority responsible for the approval and supervision of such bodies:	Document refers to competent authorities and their function as approval and supervision of the inspection/and certification bodies
18		NOP	Subpart F / Subpart E	Subpart F - Accreditation of Certifying Agents (a) The administration shall accredit a qualified domestic or foreign applicant in the areas of crops, livestock, wild crops, or handling or any combination thereof to certify a domestic or foreign production or handling operation as a certified operation. ... Subpart E - Certification A person seeking to receive or maintain organic certification under the regulations in this part must (a) comply with the Act and applicable organic production and handling regulations of this part, ...	scope includes domestic and foreign applicants. NOP includes in subpart F requirements for the accreditation of certifying agents. Also foreign certifying agents may apply for accreditation. Subpart F includes requirements operators shall fulfill in order to get certified by accredited certifying agents. NOP provides its own accreditation criteria and does not refer to ISO 65&EN 45011 as basis for accreditation.
19		JAS	note	JAS Standard System refers to the certification system to attach the JAS marks to the products inspected in accordance with the Japan Agricultural Standard (KAS Standards) established by the Minister for Agriculture, Forestry and Fisheries; Organic is only one are covered besides other areas	as of October 2005, 223 standards have been set for 71 different items There are standards for quality level, ingredients, performance etc. standards for production methods (amongst others for agricultural products) standards for distribution methods
20	References	JAS	note	For registration of Certifying Bodies ISO/IEC Guide 65 applies	JAS refers to ISO Guide 65 in its entirety
21		ISO/IEC Guide 65:1996	1.1	This Guide specifies general requirements that a third-party operating a product certification system shall meet if it is to be recognized as competent and reliable. In this Guide the term "certification body" is used to cover any body operating a product certification system. The word "product" is used in its widest sense and includes processes and services; the word "standard" is used to include other normative documents such as specifications or technical regulations.	only place in ISO 65 where it is indicated that the scope includes process certification

Table of requirements for organic certification bodies

	A	B	C	E	F
22		IFOAM AC	Introduction	Generally speaking, the IAC establishes requirements for the conduct of organic certification by the certification body, including procedures and practices of the operator that the certification body must verify. .... The IFOAM Criteria together with the IFOAM Basic Standards establish the requirements for certification bodies seeking IFOAM accreditation. The standards used by the certification body in their IFOAM accredited certification program at least meet the IFOAM Basic Standards. IFOAM accreditation is carried out under contract by the International Organic Accreditation Service Inc. (IOAS), a US based company. The structure of the IOAS and procedures for IFOAM accreditation are laid down in the IFOAM Accreditation Program Operating Manual published by the IOAS. More detailed policies and procedures are set down in the IOAS Quality Manual	Different to ISO 65, IAC clearly restricts the scope to organic certification in the context of IFOAM accreditation; this includes evaluation against IFOAM accreditation criteria and in addition the evaluation of the standard against which certification is carried out. The respective production standard shall meet IFOAM Basic Standards (IBS).
23	Labelling	EU regulation	Article 5 (c)	Labeling Article 5 The labeling and advertising of a product specified in Article 1 (1) a may refer to organic production methods only where: .. (c) the product was produced or imported by an operator who is subject to the inspection measures laid down in article 8 and 9	<i>scope is limited to organic production of agricultural products and indications referring to the organic production method</i>
24	scope		Article 8	Inspection system Article 8: Any operator who produces, prepares or imports ...products ... for the purpose of marketing shall ... (b) submit his undertaking to the inspection system referred to in Article 9	<i>EU regulation refers to an inspection system , the term "certification" does not occur</i>
25	certification system		Article 9	3. The inspection system shall comprise at least the application of the precautionary and inspection measures specified in Annex III .... 5. For the approval of the inspection body, the following shall be taken into account: (a) the standard inspection procedure to be followed, containing a detailed description of the inspection measures and precautions which the body undertakes to impose on operators to its inspections. (b) the penalties the body intends to apply where irregularities and/or infringements are found (c) the availability of appropriate resources in the form of qualified staff; ... (d) the objectivity of the inspection body vis-a-vis the operators subject to its inspection	<i>reference to Annex III that details minimum inspection requirements and precautionary measures under the inspection scheme Annex III includes requirements the operator shall do and at the same time certification requirements applicable for inspection bodies.</i>
26		Codex Guideline	Section 6	6.5 In order to attain approval as an official certification body or authority, the competent authority shall or ist designate, when making ist assessment should take into account the following: a) the standard inspection/certification procedures to be followed, including detailed description of the inspection measures and precautions which the body undertakes to impose on operators subject to inspections b) the penalties which the body intends to apply where irregularities and/or infringements are found c) the availability of appropriate resources in the form of qualified staff ... d) the objectivity of the body vis-a-vis the operators subject to inspection ... 6.7 Official and/or officially recognized certification bodies or authority referred to in paragraph 6.2 should: a) ensure that at least the inspection measures and precautions specified in Annex 3 are applied to undertakings subject to inspection and ....	<i>Reference is made to Annex 3 which similar to Annex III of the EU regulation details requirements applicable for the operator as well as requirements the certification body should follow</i>
27	Introduction	NOP	Introduction	... This program establishes national standards for the production and handling of organically produced products, including a National List of substances approved for and prohibited from use in organic production and handling. This final rule establishes a national-level accreditation program to be administered by AMS for State officials and private persons who want to be accredited as certifying agents. Under the program, certifying agents will certify production and handling operations in compliance with the requirements of this regulation and initiate compliance actions to enforce program requirements. The final rule includes requirements for labeling products as organic and containing organic ingredients. ...	<i>scope is limited to NOP regulation; it includes the applicable production/handling requirements for operators, provides for certification requirements as well as the accreditation requirements applicable for certifying agents carrying out certification against NOP organic production and handling regulations. NOP herby is the most self-contained regulation; it does not make use or refers to any other existing standard or regulation.</i>

Table of requirements for organic certification bodies

	A	B	C	E	F
28	Accreditation	NOP	Subpart F, § 205.506 Granting accreditation	<p>§ 205.506 Granting accreditation.</p> <p>(a) Accreditation will be granted when: (1) The accreditation applicant has submitted the information required by §§ 205.503 through 205.505;</p> <p>(2) The accreditation applicant pays the required fee in accordance with § 205.640(c); and</p> <p>(3) The Administrator determines that the applicant for accreditation meets the requirements for accreditation as stated in § 205.501, as determined by a review of the information submitted in accordance with §§ 205.503 through 205.505 and, if necessary, a review of the information obtained from a site evaluation as provided for in § 205.508.</p> <p>(b) On making a determination to approve an application for accreditation, the Administrator will notify the applicant of the granting of accreditation in writing, stating:</p> <p>(1) The area(s) for which accreditation is given;</p> <p>(2) The effective date of the accreditation;</p> <p>(3) Any terms and conditions for the correction of minor noncompliances; and</p> <p>(4) For a certifying agent who is a private entity, the amount and type of security that must be established to protect the rights of production and handling operations certified by such certifying agent.</p> <p>(c) The accreditation of a certifying agent shall continue in effect until such time as the certifying agent fails to renew.</p>	<p>Subpart F includes all applicable competence requirements for certifying agents and the applicable procedure for accreditation.</p> <p>§205.504, Evidence of expertise and ability covers typical competence requirements similar to some of the ISO 65 requirements.</p> <p>However as mentioned above, NOP is the most self-contained document compared to other requirements this applies to structure as well as to content and is therefore difficult to include in this comparison.</p> <p>This part even includes requirements applicable to the accreditor mentioned here as "administrator" or "Program Manager"</p>
29	certification system	ISO/IEC Guide 65:1996	1.2	<p>1.2 The certification system used by the certification body may include one or more of the following, which could be coupled with production surveillance or assessment and surveillance of the supplier's quality system or both, as described in ISO/IEC Guide 53:</p> <p>a) type testing or examination;</p> <p>b) testing or inspection of samples taken from the market or from supplier's stock or from a combination of both,-</p> <p>c) testing or inspection of every product or of a particular product, whether new or already in use;</p> <p>d) batch testing or inspection;</p> <p>e) design appraisal.</p>	<p>measures listed in ISO are adapted to product certification systems; measures specific for process certification are lacking e.g. chain of custody evaluation</p>
30		IIFOAM AC	Introduction	<p>The criteria have been based upon the requirements in ISO/IEC GUIDE 65:1996(E) "General requirements for bodies operating product certification systems". However, organic certification is certification of a process and not a product and this has required some adaptation. In addition these criteria include specific requirements concerning issues confronted by a certification body operating within the organic sector.</p>	<p>IAC refers to ISO 65 however specifies that organic certification evaluates the process and not just a product; it also refers to additional sector specific requirements</p> <p>Sampling and testing is mentioned as one of 10 listed visit procedures of on inspection visit; certification bodies are required to have documented policies and procedures on residue testing e.g. indicating the cases in which samples are taken (see IAC 6.3.3 and 6.4)</p>
31	inspection measures	EU regulation	annex III	<p>5. full physical inspection at least once a year, ...</p> <p>The inspection body or authority may take samples for testing of products not authorized under this regulation or for checking production techniques ....</p> <p>Samples may also be taken for detecting possible contamination by unauthorized products. However such analysis must be carried out where use of unauthorized products is suspected. ....</p>	<p>inspection at least once a year;</p> <p>to take samples for testing is considered as additional tool to verify compliance with the regulation; in case there is suspicion that unauthorized products have been used or there is a contamination.</p>
32		Codex Guideline	Annex 3	<p>9. The official or officially recognized certification body or authority should ensure that a full physical inspection is undertaken, at least once a year, of the unit. ....</p> <p>Additional occasional unannounced visits should also be undertaken according to need or random</p>	<p>inspection at least once a year; introduction of additional unannounced visits</p>
33	inspection measures	NOP	subpart E certification § 205.403 On-site inspections.	<p>(a) ...</p> <p>An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.</p> <p>( c ) Verification of information ...</p> <p>(3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples</p>	<p>Measures the certification agency shall take are referred to in § 205.403 On-site inspections; on-site inspections shall be conducted initially after application and later annually.</p> <p>Testing is mentioned as additional measure to verify information; it is up to the certification agency to decide on taking samples for testing in order to verify whether prohibited substances have been applied.</p>
34					

Table of requirements for organic certification bodies

	A	B	C	E	F
35		ISO/IEC Guide 65:1996	2.	ISO 8402:1994, Quality management and quality assurance - Vocabulary. ISO 10011-1:1990, Guidelines for auditing quality systems - Part 1: Auditing. ISO/IEC Guide 2:1996, Standardization and related activities - General vocabulary. ISO/IEC Guide 7:1994, Guidelines for drafting of standards suitable for use for conformity assessment. ISO/IEC Guide 23:1982, Methods of indicating conformity with standards for third-party certification systems. ISO/IEC Guide 25:1990, General requirements for the competence of calibration and testing laboratories. ISO/IEC Guide 27:1983, Guidelines for corrective action to be taken by a certification body in the event of misuse of its mark of conformity. ISO/IEC Guide 28:1982, General rules for a model third-party certification system for products. ISO/IEC Guide 39:1988, General requirements for the acceptance of inspection bodies. ISO/IEC Guide 53:1988, An approach to the utilization of a supplier's quality system in third-party product certification. ISO/IEC Guide 62:1996, General requirements for bodies operating assessment and certification registration of quality systems.	
36		IIFOAM AC	Introduction	The criteria have been based upon the requirements in ISO/IEC GUIDE 65:1996(E) "General requirements for bodies operating product certification systems". However, organic certification is certification of a process and not a product and this has required some adaptation. In addition these criteria include specific requirements concerning issues confronted by a certification body operating within the organic sector.	Reference to ISO 65; + Introduction of sector specific requirements above ISO: IAC make no reference to other ISO norms
37		ISO/IEC Guide 65:1996	3. Definitions	3. For the purposes of this Guide, the relevant definitions given in ISO/IEC Guide 2 and ISO 8402 apply, together with the following definition	
38		EU regulation	Article 9, 11.	... approved inspection bodies must satisfy the requirements laid down in the conditions of standard EN 45011	CBs are required to meet EN 45011 requirements.
39		Codex Guideline	Section 6:	6.1 ... Development of these systems (inspection and certification systems) should take into account the Principles for Food Import and Export Inspection, the guideline for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems. (17) Footnote 17: see also other agreed international standards, eg ISO65	
40		NOP	§ 205.509 Peer review panel.	The Administrator shall establish a peer review panel pursuant to the Federal Advisory Committee Act (FACA) (5 U.S.C. App. 2 et seq.). The peer review panel shall be composed of not less than 3 members who shall annually evaluate the National Organic Program's adherence to the accreditation procedures in subpart F of these regulations and ISO/IEC Guide 61, General requirements for assessment and accreditation of certification/registration bodies, and the National Organic Program's accreditation decisions ....	Reference is made to ISO 61, General Requirements for assessment and accreditation of certification/registration bodies applicable to accreditation bodies. Different to all other regulations there is no reference to ISO 65 as basis for the requirements that are applicable for certification agencies in terms of accreditation.
41					
42	Definitions				
43		IIFOAM AC	Def.		IAC includes it's own list of definitions; definitions are either sector specific, equal to or amended ISO language <i>list of definitions are not included in this table except following example</i>
44		ISO/IEC Guide 65:1996	3.1	supplier: The party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which the certification is based	
45		IIFOAM AC	Def.	operator: an individual or business enterprise, responsible for ensuring that production meets, and continues to meet, the requirements on which certification is based.	IAC uses different terminology compared to ISO language
46		EU regulation	Def., Article 4, 5.	operator' shall mean any natural or legal person who produces prepares or imports from a third country, with a view of the subsequent marketing thereof, products as referred to in article 1, or who markets such products;	List of definitions included in Article 4 of the EU Regulation does not include inspection or certification related terminology.
47		Codex Guidelines	Def.	2.2 Definitions	Terminology is similar to ISO, in addition definitions are provided for e.g. agricultural products, GMO, definition of the term 'inspection' provides clarification that in case of organic food inspection the 'examination of the production and processing system' is included.
48		NOP	Subpart A - Definitions	§ 205.2 Terms defined. <b>Accreditation.</b> A determination made by the Secretary that authorizes a private, foreign, or State entity to conduct certification activities as a certifying agent under this part ... <b>Certification or certified.</b> A determination made by a certifying agent that a production or handling operation is in compliance with the Act and the regulations in this part, which is documented by a certificate of organic operation <b>Certified operation.</b> A crop or livestock production, wild-crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agent as utilizing a system of organic production or handling as described by the Act and the regulations in this part. ...	NOP included a comprehensive list of definitions; this list also included accreditation/certification terminology. Definitions included must be seen in the context of NOP only and have no general meaning (e.g. see the definition of the term "Certification"
49					

Table of requirements for organic certification bodies

	A	B	C	E	F
50	Certification body structure/competence				
51	Structure		4.1 General Provisions		
52		ISO/IEC Guide 65:1996	4.1.1	The policies and procedures under which the certification body operates and their administration shall be non-discriminatory and shall be administered in a non-discriminatory manner. Procedures shall not be used to impede or inhibit access by applicants, other than as provided for in this Guide.	
53		IFOAM AC	2.1 Non-Discrimination	2.1.1 The policies and procedures which govern the operation of the certification body shall be non-discriminatory	identical to ISO
54		EU Regulation	Article 9. 5. Objectivity	5. For the approval of a private inspection body, the following shall be taken into account: ... (d) the objectivity of the inspection body vis-a-vis the operators subject to its inspection.	does not add anything to the applicable ISO requirements
55		NOP	§ 205.501 (non discrimination)	(d) No private or governmental entity accredited as a certifying agent under this subpart shall exclude from participation in or deny the benefits of the National Organic Program 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.	<i>different in wording, but content is the same</i>
56	access to service	ISO/IEC Guide 65:1996	4.1.2	4.1.2 The certification body shall make its services accessible to all applicants whose activities fall within its declared field of operation. There shall not be undue financial or other conditions. Access shall not be conditional upon the size of the supplier or membership of any association or group, nor shall certification be conditional upon the number of certificates already issued.	
57	access to service/ standardized fee structure	IFOAM AC	2.2 access to service	2.2.1 The certification body shall make its services accessible for all applicants whose activities fall within its declared field of application. Certification requirements, inspections and decisions shall be confined to the scope of the certification being granted 2.2.2 Access to certification shall not be conditional upon the size of the supplier operator or membership of any association or group, nor shall certification be conditional upon the number of certificates already issued by the certification body. 2.2.3 The fee structure shall be standardized and available on request	<i>Identical to ISO; IAC 2.2.3 (to have a standardized fee structure) is additional to ISO</i>
58	non discrimination	NOP	§ 205.501 non discrimination	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: ... (19) Accept all production or handling applications that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group;	Identical to ISO and equal to IAC adds the matter of a standardized fee structure
59	fee structure	NOP	§ 205.501	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (16) Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator;	requirements to fee structure is equal to IAC requirement regarding standardized fee structure.
60					
61	scope of certification	ISO/IEC Guide 65:1996	4.1.3	The criteria against which the products of a supplier are evaluated shall be those outlined in specified standards. Requirements for standards suitable for this purpose are contained in ISO/IEC Guide 7. If explanation is required as to the application of these documents for a specific certification system, it shall be formulated by relevant and impartial committees or persons possessing the necessary technical competence, and published by the certification body.	
62	scope of certification	IFOAM AC	2.3. Certification Scope	2.3.1 Organic certification shall be granted solely on the basis of a determination of an operation's conformity with specified published standards. These standards used by the certification body shall cover all production systems or product categories certified.	
63	scope of certification	ISO/IEC Guide 65:1996	4.1.4	The certification body shall confine its requirements, evaluation and decision on certification to those matters specifically related to the scope of the certification being considered	
64	scope of certification	IFOAM AC	2.2 access to service	2.2.1 The certification body shall make its services accessible for all applicants whose activities fall within its declared field of application. Certification requirements, inspections and decisions shall be confined to the scope of the certification being granted	
65	scope of certification	NOP	§ 205.501	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (3) Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;	§ 205.402 provides for requirements how the certification agent shall "review the application"; ... 403 covers "on site inspection" 405, denial of certification, 406, continuation of certification 607, addresses conflict of interest provisions Reference is made to the applicable certification standards and procedures; in context of NOP regulation, requirements are equal to ISO and IAC
66	"Impartial" Organization	ISO/IEC Guide 65:1996	4.2 Organization	The structure of the certification body shall be such as to foster confidence in its certifications. In particular, the certification body shall .... (a-p follows)	

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	A	B	C	E	F
67		IFOAM AC	1.1 General Requirements	1.1.1 The certification body shall have a documented and effective structure and organization that fosters confidence in its certification.	
68		ISO/IEC Guide 65:1996	4.2 a)	be impartial	
69		IFOAM AC	1.3 Impartiality and Objectivity	1.3.1 The certification body shall have structures and procedures to enable it to be free to operate without undue influence from vested interests. 1.3.2 The certification body shall be impartial. Inspection and certification shall be based on an objective assessment of relevant factors, following documented procedures.	
70			1.3.8 & 1.3.9	1.3.8 Fee structures and other issues related to payment should shall not compromise objectivity. 1.3.9 The certification body or its personnel shall not accept a substantial gift or favor. The certification body shall establish a policy on what are/are not substantial gifts	<i>In addition to ISO, IAC specifically refers to fee structure and gifts as critical issues in order to safeguard objectivity and impartiality.</i>
71				§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (1) Prevent conflicts of interest by: Not permitting any employee, inspector, contractor, or other personnel to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected ...	
72		JAS	note	Applicants for registration must not be under the control of producers, etc. of agricultural and forestry products related to the said application	
73	Responsibility	ISO/IEC Guide 65:1996	4.2 b)	be responsible for decisions relating to its granting, maintaining, extending, suspending and withdrawing of certification;	
74		IFOAM AC	1.2 Responsibility	1.2.1 The certification body shall take full responsibility for all activities operated or sub-contracted out and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification 1.2.2 The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside body or person	
75	competence	NOP		§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part; (2) Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart; (3) Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;	subcontracting is not mentioned, certifying agents are responsible to comply with all applicable NOP requirements; this includes implementation of certification including 404 Granting certification, 405 denial of certification, 406 continuation of certification; however different to ISO and IAC NOP is much more descriptive on how granting, denial, continuation of certification shall be carried out.
76	responsibility	ISO/IEC Guide 65:1996	4.2 c)	identify the management (committee, group or person) which shall have overall responsibility for all of the following: 1) performance of testing, inspection, evaluation and certification as defined in this Guide, 2) formulation of policy matters relating to the operation of the certification body, 3) decisions on certification, 4) supervision of the implementation of its policies, 5) supervision of the finances of the body, 6) delegation of authority to committees or individuals as required to undertake defined activities on its behalf, 7) technical basis for granting certification	
77	responsibility	IFOAM AC	1.1 General Requirements	1.1.3 The certification body shall identify the management (committee, group or person) which is responsibility responsible for all each of the following: a. performance, inspection, evaluation and certification as defined in these criteria, b. formulation of policy matters relating to the operation of the certification body, c. decisions on certification, d. supervision of the implementation of its policies, e. supervision of the finances of the body, f. delegation of authority to committees or individuals as required to undertake defined activities on its behalf, g. technical basis for granting certification.	

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	A	B	C	E	F
78	responsibility and legal structure	NOP	§ 205.503 Applicant information.	§ 205.503 Applicant information. A private or governmental entity seeking accreditation as a certifying agent must submit the following information: (a) The business name, primary office location, mailing address, name of the person(s) responsible for the certifying agent's day-to-day operations, contact numbers (telephone, facsimile, and Internet address) of the applicant, and, for an applicant who is a private person, the entity's taxpayer identification number; ... (2) A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment	Different to ISO and IAC NOP does explicitly request the applicant certifying agent to identify the management responsible to manage and supervise certification related work and finances.
79	legal structure	ISO/IEC Guide 65:1996	4.2 d)	have documents which demonstrate it is a legal entity;	
80	legal structure	IIFOAM AC	1.1 General Requirements	1.1.2 The certification body shall have documents, which demonstrate that it is a legal entity	
81		NOP		§ 205.503 Applicant information. A private or governmental entity seeking accreditation as a certifying agent must submit the following information: ... (2) A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment	
82		ISO/IEC Guide 65:1996	4.2 e)	have a documented structure which safeguards impartiality including provisions to ensure the impartiality of the operations of the certification body; this structure shall enable the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system	
83		IIFOAM AC	1.3 Impartiality and Objectivity, 1.3.1-1.3.3	1.3.1 The certification body shall have structures and procedures to enable it to be free to operate without undue influence from vested interests. 1.3.2 The certification body shall be impartial. Inspection and certification shall be based on an objective assessment of relevant factors, following documented procedures. 1.3.3 The organizational structure of the certification body shall ensure that parties significantly affected by the certification system can participate in the development of its principles and policies	
84					<i>involvement of stakeholders is not required by NOP, on the contrary conflict of interest requirements exclude any participation of stakeholders</i>
85	Division of functions	ISO/IEC Guide 65:1996	4.2 f)	ensure that each decision on certification is taken by a person(s) different from those who carried out the evaluation.	
86		IIFOAM AC	Division of Function 1.3.10-1.3.11	1.3.10 The certification body shall have clear division of the functions of the inspection, certification and appeals 1.3.11 Persons responsible for a decision that is being appealed may not be involved in the decision on that appeal	<i>IAC requires that appeals are also subject to the division of function principle</i>
87		NOP	NOP	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: ... (11) Prevent conflicts of interest by: ... (vi) Ensuring that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection.	<i>separation of functions is the same; according to NOP appeals are not resolved by the certifying agent internally but by the administrator</i>
88	rights and responsibilities to carry out certification	ISO/IEC Guide 65:2002	4.2 g)	have rights and responsibilities relevant to its certification activities;	
89		IIFOAM AC	Operator Obligations 6.1.3	6.1.3 The certification system shall be based on written agreements and clear responsibilities with all parties involved in the chain of production of a certified product	
90		NOP		see subpart E Certification; includes operator obligations etc.	<i>rights and responsibilities regarding certification activities of parties involved (operator, certifying agent, administrator are part of the law</i>
91		ISO/IEC Guide 65:1996	4.2 h)	have adequate arrangements to cover liabilities arising from its operations and/or activities.	
92		IIFOAM AC	1.4 Resources, Financial and Personnel Resources	1.4.1 The certification body shall have financial stability and personnel resources necessary for the effective operation of a certification system <i>Guidance: Financial stability shall include provisions to cover liabilities in situations where there is a significant risk of being sued</i>	<i>IAC requires liability arrangements only in situations where there is a significant risk of being sued IAC specifically stresses personnel resources</i>

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	A	B	C	E	F
93		ISO/IEC Guide 65:1996	4.2 i)	have the financial stability and resources required for the operation of a certification system;	
94		IFOAM AC	1.4 Resources, Financial and Personnel Resources	1.4.1 The certification body shall have financial stability and personnel resources necessary for the effective operation of a certification system Guidance: ....	IAC specifically stresses personnel resources; however there is no difference see ISO 4.2 j)
95	financial stability	NOP	Subpart F	§ 205.501 General requirements for accreditation. (c) A private entity accredited as a certifying agent must: (1) Hold the Secretary harmless for any failure on the part of the certifying agent to carry out the provisions of the Act and the regulations in this part; (2) Furnish reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of production and handling operations certified by such certifying agent under the Act and the regulations in this part; ...	comparable to IAC and ISO 65
96	Personnel resources	ISO/IEC Guide 65:1996	4.2 j)	employ a sufficient number of personnel having the necessary education, training, technical knowledge and experience for performing certification functions relating to the type, range and volume of work performed, under a responsible senior executive,	
97		IFOAM AC	1.4 Resources, Financial and Personnel Resources	1.4.2 The certification body personnel shall have the necessary education, training, technical knowledge and experience for performing functions relating to the type, range and volume of work performed.	
98		EU Regulation	Article 9, 5, ( c) (resources)	5. For the approval of a private inspection body, the following shall be taken into account: ... (c) the availability of appropriate resources in the form of qualified staff, administrative and technical facilities, inspection experience and reliability	does not anything to the applicable ISO 65 requirements
99		NOP	Subpart F	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: ... (4) Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part; (5) Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.	Equal to ISO and IAC, NOP addresses "sufficient number" and expertise of personnel and
100	Quality system	ISO/IEC Guide 65:1996	4.2 k)	have a quality system giving confidence in its ability to operate a certification system for products	
101		IFOAM AC	3.2 Quality system	3.2.1 The certification body shall operate an effective quality system in accordance with the relevant elements of these criteria and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available to, and understood by, the certification body personnel.	
102		NOP	Subpart F	§ 205.504 Evidence of expertise and ability. A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; ... (a) <u>Personnel</u> . (1) A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel; ... (b) <u>Administrative policies and procedures</u> . (1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates; ...	Although NOP does not use the terminology Quality Policy, it requests Certifiers to have all elements that constitute an effective Quality System; <i>the requirement to constantly seek for Quality improvement can be found under § 205.501 General requirements for accreditation, (a) (6) and (7), addressing performance review of personnel as well as program review</i>
103		ISO/IEC Guide 65:1996	4.2 l)	have policies and procedures that distinguish between product certification and any other activities in which the certification body is engaged	
104		IFOAM AC	1.3 Impartiality and Objectivity	1.3.4 The certification body shall not provide any product or service which could compromise the confidentiality, objectivity or impartiality of its certification process, unless the product/service and certification programs are clearly separated in a manner that ensures that such compromise cannot occur.	<i>compared to ISO there is no requirement for policies and procedures to distinguish between product certification and any other activities</i>

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105		NOP		see § 205.501(a)(10) maintain confidentiality, (11); prevent conflict of interest	<i>compared to ISO and IAC, NOP does not specifically address the situation that an certifying agency may be active in other business areas besides certification, although NOP clearly prohibits CBs to do consultancy service or to have any other commercial interests related to certified operations. However as long as conflict of interest requirements are met, certifying agents are free to be active in other areas, whereas ISO in any case requests clear policies and procedures to distinguish the activities.</i>
106		ISO/IEC Guide 65:1996	4.2 m)	together with its senior executive and staff, be free from any commercial, financial and other pressures which might influence the results of the certification process	
107		IIFOAM AC	1. Structure Conflict of Interest of Individuals	1.3.16 The certification body shall ensure that a declaration of interest is updated annually by all persons involved in certification, inspection and appeals as well as by the board. Such declarations shall be on file and take into account both direct and indirect interests. The certification body shall review the declarations and identify what constitutes a conflict. 1.3.17 All persons with a conflict of interest shall be excluded from work, discussion and decisions in all stages of the certification process related to the potential conflict. The exclusion of such persons should be recorded in minutes or other records.	<i>IAC requires a declaration of all interests in the organic industry and in addition requests the CB to take the responsibility/ decision about what constitutes a conflict. Base on that persons shall be excluded from work related to the potential conflict</i>
108	Conflict of Interest provisions	NOP		§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (11) Prevent conflicts of interest by: (i) Not certifying a production or handling operation if the certifying agent or a responsibly connected party of such certifying agent has or has held a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12-month period prior to the application for certification; (ii) Excluding any person, including contractors, with conflicts of interest from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12-month period prior to the application for certification; (iii) Not permitting any employee, inspector, contractor, or other personnel to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected, Except, That, a certifying agent that is a not-for-profit or	<i>conflict of interest requirements are more restrictive compared to ISO and IAC excluding the certification of any operation to which the certification agency or connected party has or has held interest whereas e.g. IAC exclude persons concerned from being involved in the respective certification decision.</i>
109				(iv) Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification; (v) Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report; and	
110	balance of interest/ stakeholder participation	ISO/IEC Guide 65:1996	4.2 n)	have formal rules and structures for the appointment and operation of any committees which are involved in the certification process. such committees shall be free from any commercial financial and other pressures that might influence decisions; a structure where members are chosen to provide a balance of interests where no single interest predominates will be deemed to satisfy this provision	
111		IIFOAM AC	1.2 Responsibility	1.2.4 The Governing Board shall remain responsible for certification decisions but may delegate authority for taking certification decisions to one or more certification committees. 1.2.5 Where decisions are delegated to individual certification officers, the certification body shall have reporting and review procedures that enable the Governing Board or the certification committee to exercise control over and responsibility for such decisions. 1.2.6 Committees shall have clear responsibilities and rules of procedures 1.3.7 The body making or ratifying certification decisions shall be free from any commercial, financial and other pressure that might influence decisions; Guidance: A structure where members are chosen to provide a balance of diverse stakeholder interests and where no single interest predominates shall be deemed to satisfy this provision. Such diversity shall include that at least one general interest is represented such as consumers, scientists or environmentalists.	<i>IAC specifically stresses oversight over certification officers which is not addressed by ISO ISO refers to "balance of interests" whereas IAC in its guidance to 1.3.7 refers to "balance of diverse stakeholder interests" and requires the inclusion of at least "one general interest" such as consumers, scientists or environmentalist. The inclusion of interest from outside the organic industry is additional to ISO.</i>
112			NOP	§205.504 Evidence of expertise and ability, mentions that the possible existence of a "certification review and evaluation committee"	<i>There are no requirements on how committee members involved in the certification process shall be composed; the stakeholder participation concept which exists in ISO and IAC is not addressed. NOP even excludes participation of the main stakeholder (certified operators) by applying NOP conflict of interest provisions (see 205.501 (11))</i>

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113		ISO/IEC Guide 65:1996	4.2 a)	ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications, and it shall not 1) supply or design products of the type it certifies 2) give advice or provide consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification requested 3) provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions	
114		IFOAM AC	1.3 Impartiality and Objectivity	1.3.4 The certification body shall not provide any product or service which could compromise the confidentiality, objectivity or impartiality of its certification process and decision making, unless these product/service and certification programs are clearly separated in a manner that ensures that such compromise cannot occur. 1.3.5 The certification body shall not engage in the marketing of certified products or promotion of individual products and shall have a policy and an appropriate procedure for responding to product inquiries from the trade or consumers. This shall ensure an equal treatment for all certified operators. The certification body shall not solicit individual application based on the needs of individual buyers. 1.3.6 Certification bodies shall ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications	IAC 1.3.5 is additional to ISO; ISO excludes supply or design of products whereas IAC in addition refers to marketing; IAC is more detailed and also covers the response of certifiers to inquiries about certified products
115	Consulting and Advising	IFOAM AC	1.3.12 - 1.3.15	1.3.12 Certification bodies shall not provide consultancy services to operators. 1.3.13 Pre-assessment of production performed by a certification body to identify areas of nonconformity shall not include advice on how to overcome these non-conformities. 1.3.14 Specific advice to operators shall be limited to explanations of the standards or certification requirements. This information shall not be offered for additional fees and shall not prescribe solutions. 1.3.15 Certification bodies may provide general information for additional fees, provided that this service shall be offered to all certified operators in a non-discriminatory manner.	compare with ISO 4.2o 2: IAC (1.3.12) is additional as it prohibits all consultancy directed to operators whereas ISO prohibition is restricted to consultation on overcoming barriers to certification; however IAC allows to provide explanations of the standards or certification requirements, see 1.3.15 IAC 1.3.13 introduces the term "pre-assessment" (not addressed by ISO); CBs may conduct pre-assessment provided pre-assessment does not include advice on how to overcome identified non-conformities. IAC 1.3.14 is not addressed by ISO dealing with matters which are acceptable and not considered as advice to overcome certification barriers (to provide explanation of standards or certification requirements is acceptable)
116		NOP		§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (11) Prevent conflicts of interest by: ... (iv) Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification;	NOP prohibits advice or consultancy service to prevent conflict of interest situations; Comparable to ISO also NOP specifies the manner of prohibited consultancy as advice on how to overcome identified barriers to certification; IAC is most restrictive clarifying that only explanation to standards and certification procedures is the only acceptable advice as CB may give.
117		ISO/IEC Guide 65:1996	4.2 p)	have policies and procedures for the resolution of complaints, appeals and disputes received from suppliers or other parties about the handling of certification or any other related matters.	
118		IFOAM AC	3.5 Complaints	3.5.1 The certification body shall have procedures for consideration of complaints brought by operators or third parties concerning its own performance or concerning the compliance of certified operators with the standards. 3.5.2 Complaints shall be dealt with in a timely and efficient manner 3.5.3 When a complaint is resolved, a documented resolution shall be made. The complainant shall be informed of the general outcome of the complaint in a way which does not prejudice the confidentiality of the party concerned.	For appeals see IAC 7.8; Appeals are "against certification decisions"; Complaints are related to CBs or operators performance IAC is additional to ISO distinguishing between appeals and complaints and detailing the content of the requested procedures
119			NOP	§ 205.663 Mediation. Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent. § 205.681 Appeals. (a) Certification appeals. An applicant for certification may appeal a certifying agent's notice of denial of certification, and a certified operation may appeal a certifying agent's notification of proposed suspension or revocation of certification to the Administrator. Except, That, when the applicant or certified operation is subject to an approved State organic program the appeal must be made to the State organic program which will carry out the appeal pursuant to the State organic program's appeal procedures approved by the Secretary.	NOP does not include requirements on how to deal with complaints (other than appeals regarding certification decisions) Appeals are dealt with through mediation involving a qualified mediator mutually agreed on; if mediation is not accepted operators have the right to appeal decisions directly to the administrator. NOP does not require certifying agents to have policies and procedures for the resolution of appeals; the procedure for mediation and appeals are outlined as part of the NOP to be followed by operators and certifying agents. Dealing with other disputes than appeals is not covered.

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120	4.3 Operations	ISO/IEC Guide 65:1996	4.3	4.3 The certification body shall take all steps necessary to evaluate conformance with the relevant product standards according to the requirements of specific product certification system (see clause 3). The certification body shall specify the relevant standards or parts thereof and any other requirements such as sampling, testing and inspection requirements which form the basis for the applicable certification system. In conducting its certification operations, the certification body shall observe, as appropriate, the requirements for the suitability and competence of body(ies) or person(s) carrying out testing, inspection and certification/registration as specified in ISO/IEC Guides 25, 39 and 62.	
121	Visit procedures	I/OAM AC	6.3.1	6.3.1 The organic management system of the operator shall be evaluated against the standards and certification requirements	<i>ISO focus on testing; whereas IAC 6.3 focus on "visit procedures"; testing is only additional in case of suspicious (see IAC 6.3 visit procedures and 6.4 sampling procedures sector specific based on the process certification approach of organic</i>
122				§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (3) Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 (review of application; on site inspection including testing; granting certification, denial of certification, continuation of certification) through 205.406 and § 205.670 (conflict of interests) ;	NOP refers to standards, requirements and procedures outlined in NOP; testing is additional
123	Subcontracting work				
124	4.4. Subcontracting	ISO/IEC Guide 65:1996	4.4. Subcontracting	4.4 When a certification body decides to subcontract work related to certification (e.g. testing or inspection) to an external body or person, a properly documented agreement covering the arrangements including confidentiality and conflict of interest shall be drawn up. The certification body shall	
125		ISO/IEC Guide 65:1996	4.4 a)	4.4 a) take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification	
126		ISO/IEC Guide 65:1996	4.4 b)	4.4 b) ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing, inspection or other technical activities (see clause 2), and is not involved either directly or through the person's employer with the design or production of the product in such a way that impartiality would be compromised	see IAC 1.4.11;1.4.12
127		ISO/IEC Guide 65:1996	4.4 c)	4.4 c) obtain the applicant's consent.	<i>ISO requirement to obtain applicants consent is not included in IAC</i>
128		ISO/IEC Guide 65:1996		4.4 c) ... NOTES 2 Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) and satisfy itself regarding the matters detailed in 4.4 b) - 3 The requirements given in 4.4 a) and b) are also relevant, by extension, when a certification body uses, for granting its own certification, work performed by another certification body with which it has signed an agreement.	
129		I/OAM AC	Subcontractors 1.4.12	1.4.12 When a certification body subcontracts work related to certification to an external body, or person, an agreement covering the arrangements shall be drawn up. This shall include the requirement to comply with all relevant aspects of these criteria.	
130		I/OAM AC	1.2 Responsibility	1.2.1 The certification body shall take full responsibility for all activities operated or sub-contracted out and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification.	
131		I/OAM AC	Subcontractors 1.4.11	1.4.11 The integrity, competence and transparency of any subcontracted components of the certification system remain the responsibility of the certification body	
132		NOP		not addressed, although conflict of interest provisions apply for "contractors" as well	there are no specific requirements dealing with subcontracting work
133					not addressed by ISO, compare with see ISO notes 4.4, 2 and 3

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	A	B	C	E	F
134	Certification scope and chain of custody	IFOAM AC	Certification scope and chain of custody 2.3.2	2.3.2 The certification body shall not issue any license to use its certification mark on or issue any certificate for any product unless it is assured of the chain of custody of the product. Where steps in the production chain have been certified by other certification bodies, the criteria in section 9 shall be applied.	section 9 deals with "Acceptance of Prior Certification and generally distinguishes between two ways of acceptance: - based on recognition of a certification Programme and - based on document review The requirements are above ISO and consider the fact that CBs certify against differing organic standards and different competence requirements The aim is to safeguard that ingredients and products (whole product chain) comply with the requirements applicable. It shall be noted that these mechanism are applied differently in regulatory vs.. voluntary systems.
135		IFOAM AC	2.3.3, 2.3.4, 2.3.5	2.3.3 Any entity in the chain of custody that has produced, processed, or packaged or affixed a label referring to the organic production method to a product an organic product shall have been certified. Contracted production (see below) shall have been inspected. 2.3.4 Certification bodies shall conduct a risk assessment to determine the necessity for, or frequency of, inspection of all storage facilities including port facilities. Where this reveals a need for inspection to protect organic integrity, inspection shall be done 2.3.5 The certification body shall require that the party owning the product at the point of transport be responsible for maintaining the organic integrity in the transport process, unless transport operations are certified in their own capacity.	not addressed by ISO
136	product chain	EU Regulation	Annex III, 1.	1. Minimum inspection requirements The inspection requirements of this annex shall apply without prejudice of the measures adopted by the Member States necessary to ensure traceability of the products, as referred to in article 9(12) (a) and (c), during the entire production chain, and to ensure that the provisions of this Regulation are satisfied.	clarification that the inspection system is applicable to the entire production chain; not addressed by ISO as already mentioned (see comment on IAC 2.3.3-2.3.5 above)
137		NOP	Subpart B Applicability	Subpart B - Applicability § 205.100 What has to be certified. (a) Except for operations exempt or excluded in § 205.101, each production or handling operation or specified portion of a production or handling operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must be certified according to the provisions of subpart E of this part and must meet all other applicable requirements of this part.	NOP does not address specifically that the entire production chain shall be under surveillance of the certification system; reference is made only related to applicability of the regulation stating that each production or handling operation must be certified, there are no further requirements to safeguard that each stage in the chain is certified.
138					
139	Certification Scope and Contracted Production and processing requirements	IFOAM AC	2.3.6-2.3.11	2.3.6 The certification body shall have policies and procedures for regulating contracted production or processing, where the contracted party is not required to be certified in their own right. A certification body may not issue a certificate of any type to the contracted operator. 2.3.7 The policy shall prescribe the circumstances where the contracted party is not required to be certified. This shall preclude the contracted party from marketing certified products and require the raw materials supply, and the sales to be under the control of the certified licensee. This shall normally mean that the contracted party does not take title of the product. 2.3.8 The contracted party shall be inspected by the certification body before the use of the contracted product or service. Subsequent inspections shall be made annually or at a frequency determined on a case by case basis providing that the certification body documents the reasons for the reduced frequency.	IAC contracted production and processing requirements are not addressed by ISO
140		IFOAM AC		2.3.9 The certification body shall require that the certified operator shall be held fully responsible for the contracted production or processing and be subject to sanctions in the event of noncompliance of the contracted parties. 2.3.10 The certification body shall require that the contracted party have a contractual relationship with the certification body that includes clauses regarding compliance to the standards, obligation to provide information, and access to the certification body. This may either be achieved through a direct contract between the parties or by an agreement between the operator and the contracted party in which the contracted party binds itself directly to the certification body. 2.3.11 The certification body shall require that each contracted party owns and understands the current version of the applicable standards and a general description of the certification program.	
141		EU Regulation		not addressed	
142		NOP		not addressed	
143	Quality System and respective documentation				

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144			<b>4.5 Quality System</b>		
145		ISO/IEC Guide 65:1996	4.5.1	The management of the certification body having executive responsibility for quality shall define and document its policy for quality and its objectives for, and commitment to, quality. The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization.	
146		ISO/IEC Guide 65:1996	4.5.2	The certification body shall operate an effective quality system in accordance with the relevant elements of this Guide and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available for use by the certification body staff. The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. The certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for a) ensuring that a quality system is established, implemented and maintained in accordance with this Guide, and b) reporting on the performance of the quality system to the body's management for review and as a basis for improvement of the quality system.	
147		ISO/IEC Guide 65:1996	4.5.3	The quality system shall be documented in a quality manual and associated quality procedures, and the manual shall contain or refer to at least the following: a) a quality policy statement; b) a brief description of the legal status of the certification body, including the names of its owners and, if different, names of the persons who control it; c) the names, qualifications, experience and terms of reference of the senior executive and other certification personnel, both internal and external; d) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive; e) a description of the organization of the certification body, including details of the management (committee, group or person) identified in 4.2 c), its constitution, terms of reference and rules of procedure; f) the policy and procedures for conducting management reviews.'	
148		ISO text continuation		g) administrative procedures including document control; h) the operational and functional duties and services pertaining to quality, so that the extent and limits of each person's responsibility are known to all concerned; i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance; j) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence; k) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken; l) the procedures for evaluating products and implementing the certification process, including 1) the conditions for issue, retention and withdrawal of certification documents, 2) controls over the use and application of documents employed in the certification of products; m) the policy and procedure for dealing with appeals, complaints and disputes; n) its procedures for conducting internal audits, based on the provisions of ISO 1 001 1 -1.	
149		IIFOAM AC	<b>3. Quality System for Certification</b>		
150			<b>3.1 Quality Policy</b>	3.1.1 The Certification Body shall document its objectives for and commitment to quality in a quality policy. The management shall ensure that this policy is understood, implemented and maintained	
151			<b>3.2 Quality System</b>	3.2.1 The certification body shall operate an effective quality system in accordance with the relevant elements of these criteria and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available to, and understood by, the certification body personnel.	<b>deviant from ISO 65, IAC doesn't specify that there shall be a designated "Quality manager" with defined authority to ensure implementation of the Quality system (ISO 4.5.2 a-b)</b>
152			<b>7.1.4</b>	7.1.4 The certification body shall execute its certification activities in compliance with all its stated procedures and standards	

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153			<b>3.3 Quality documentation</b>	3.3.1 the quality documentation shall include at least the following: a) a brief description of the legal status of the certification body; <i>Guidance: The description shall include the names of its owners and, if different, names of the persons who control it;</i> b) the names, qualifications, experience and terms of reference of the Governing Board, senior executive and other certification personnel, both internal and external; c) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive; d) a description of the organization of the certification body, including details of the management (committee, group or person) identified in 1.1.3; e) the policy and procedures for conducting management reviews; f) administrative procedures including document control;	<i>deviant to ISO, IAC is lacking the requirement to compile a quality manual IAC doesn't not require to include in the quality documentation: a quality policy statement and procedures for conducting internal audits; although chapter 3.4 of IAC specify requirements for internal audits that are equal to ISO 65 requirements concerning Internal audits (ISO 4.7)</i>
154		<b>IAC text continuation</b>		g) the operational and functional duties and services, so that the extent and limits of each person's responsibility are known to all concerned; h) the procedure for the recruitment and training of certification body personnel and monitoring of their performance; i) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence; j) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken; k) the procedures for evaluating products and implementing the certification process, including the conditions for issue, retention and withdrawal of certification documents, and the controls over the use and application of documents employed in the certification of products; l) the policy and procedure for dealing with appeals and complaints.	
155	<b>Training</b>	<b>IIFOAM AC</b>	<b>1.4.9, 1.4.10</b>	1.4.9 The certification body shall have a documented training policy, including initial and ongoing training, for all personnel, including contracted inspectors, and committee members, that is sufficient to ensure continued competence. 1.4.10 The certification body shall ensure that before undertaking inspection, new inspectors have at least successfully completed a training course in inspection of organic operations and undergone a defined on-site apprenticeship period.	<i>compare with ISO 4.5.3i; IAC is more specific requiring both initial and ongoing training; requirement for onsite apprenticeship period not addressed by ISO</i>
156		<b>EU Regulation</b>		EN 45011/ISO 65 requirements fully apply	<i>see the differences identified between ISO and IAC</i>
157		<b>NOP</b>		see ISO 4.5.1 and 4.5.2	<b>NOP regulation does not adhere to Quality system concept and documentation as required according to ISO 65; the general requirement to run the programme based on a documented Quality policy with documented policies and procedures is lacking, same applies for the requirement to ensure effective implementation of the system; e.g. appointment of a Quality system manager etc.) However certain Quality System documents listed in ISO 65 and IAC are also listed under subpart F §205.501 General requirements für accreditation and § 205.502 applying for accreditation; Different to ISO and IAC, NOP has already included several procedural instructions (e.g. §205.405 Denial of certification). ISO or IAC require the certification body to develop.</b>
158		<b>NOP</b>		§ 205.503 Applicant information. A private or governmental entity seeking accreditation as a certifying agent must submit the following information: (d) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: (1) A governmental entity, a copy of the official's authority to conduct certification activities under the Act and the regulations in this part, (2) A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment;	<b>compare with ISO 4.5.3: NOP lacks the requirement for a Quality Policy</b>

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159		NOP		<p>§ 205.504 Evidence of expertise and ability.</p> <p>(a) Personnel. (1) A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel;</p> <p>(2) The name and position description of all personnel to be used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation committees, contractors, and all parties responsibly connected to the certifying agent;</p> <p>(3) A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for:</p> <p>(i) Each inspector to be used by the applicant and</p> <p>(ii) Each person to be designated by the applicant to review or evaluate applications for certification; and</p> <p>(4) A description of any training that the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part.</p>	<p>compare with ISO 4.4.3 e) h) and i)</p> <p>Different to ISO NOP does not require a procedure for recruitment and selection of certification personnel; description of the organization/ organisational chart as requested in detail according to ISO 4.5.3 d) and e) is not mentioned in NOP</p>
160		NOP		<p>§ 205.501 General requirements for accreditation.</p> <p>(a) A private or governmental entity accredited as a certifying agent under this subpart must:</p> <p>(6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;</p> <p>(7) Have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any noncompliances with the Act and the regulations in this part that are identified in the evaluation;</p>	<p>compare with ISO 4.5.3 f and n, Internal audit and management review; can be considered as equal</p>
161		NOP		<p>§ 205.504 Evidence of expertise and ability.</p> <p>A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information ...</p> <p>(b) Administrative policies and procedures. (1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;</p> <p>(2) A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator;</p> <p>(3) A copy of the procedures to be used for complying with the recordkeeping requirements set forth in § 205.501(a)(9);</p> <p>(4) A copy of the procedures to be used for maintaining the confidentiality of any business-related information as set forth in § 205.501(a)(10);</p> <p>(5) A copy of the procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request:</p>	<p>compare with ISO 4.5.3 g) administrative procedures including document control as well as k) procedures regarding non-conformities and l) procedures for evaluating products and implementing the certification process;</p> <p>regarding ISO 4.5.3 k) see also NOP § 205.405 Denial of Certification; paragraph outlines the procedures to be followed by the Certifying agents in case of non-compliances.</p>
162		NOP		see ISO 4.5.3 j)	<p>NOP does not address ISO requirement 4.5.5 j) regarding sub-contractors (list of sub-contractors, procedure for assessing, recording and monitoring their competence</p>
163		NOP		see ISO 4.5.3 m)	<p>The requirement that a Certifier shall have a Policy and procedures on how to deal with with appeals and disputes is not included in NOP however see § 205.663 Mediation and 205.405 Denial of certification applicable for certifying agents; Different to ISO and IAC which require CBs to develop their own policies and procedures, NOP has included with this paragraph the applicable appeals procedure.</p> <p>Complaints are mentioned under § 205.661 Investigation of certified operations</p>
164					
165					
166					
167	4.6 Conditions and procedures for granting, maintaining, extending, suspending and withdrawing certification	ISO/IEC Guide 65:1996	4.6.1	4.6.1 The certification body shall specify the conditions for granting, maintaining and extending certification and the conditions under which certification may be suspended or withdrawn, partially or in total	

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168		ISO/IEC Guide 65:1996	4.6.2	4.6.2 The certification body shall have procedures to a) grant, maintain, withdraw and, if applicable, suspend certification., b) extend or reduce the scope of certification., c) re-evaluate, in the event of changes significantly affecting the product's design or specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system.	
169		Ifoam AC	7. Certification Procedures 7.1 General Requirements	7.1.2 The certification body shall specify contractual requirements under which it grants, and the procedures for granting certification	
170		Ifoam AC		7.1.3 The certification body shall have procedures to a. grant, maintain, withdraw and, if practiced, suspend certification; b. extend or reduce the scope of certification; c. re-evaluate the operation	
171	Sanctions	Ifoam AC	7.7 Sanctions	7.7.1 The certification body shall have a documented range of sanctions including measures to deal with minor non-conformities with the standards. 7.7.2 Documented procedures for imposing sanctions shall be in place. 7.7.3 Where a non-conformity that affects organic integrity is found, the certification body shall require that the certification mark or any other indication of the certification is removed from the entire production run or product affected by the non-conformity concerned. 7.7.4 Where a serious non-conformity is made by the operator, the certification body shall withdraw certification from the operator for a specified period. 7.7.5 The certification body shall have procedures for immediate suspension of certification in cases where the inspector detects manifest non-conformities or fraudulent activity. 7.7.6 The reasons for sanctions shall be provided to the operator.	<i>the IAC requirement 7.7.1 to have a "documented range of sanctions" and (7.7.2) "documented procedures" for imposing sanctions is not addressed by ISO which requires procedure for suspension (if applicable) and withdrawal only; same applies for IAC 7.7.6; IAC 7.3.3 establishes the condition under which removal of CBs mark is required (in case organic integrity is affected); whereas ISO leaves it open and requires the CB to specify the conditions; can be considered as sector specific requirement; same applies for 7.7.4. IAC 7.7.5 relates to emergency withdrawal due to potential fraud which is not addressed by ISO 65;</i>
172	Inspection system	EU regulation	Article 9, 3.	3. The inspection system shall comprise at least the application of the precautionary and inspection measures specified in Annex III	
173		EU regulation	Article 9, 5.	5. For the approval of a private inspection body, the following shall be taken into account: (a) the standard inspection procedure to be followed, containing a detailed description of the inspection measures and precautions which the body undertakes to impose on operators subject to its inspection; (b) the penalties which the body intends to apply where irregularities and/or infringements are found (c) the availability of appropriate resources in the form of qualified staff, administrative and technical facilities, inspection experience and reliability (d) the objectivity of the inspection body vis a vis the operators subject to its inspection	
174		NOP		§205.504 Evidence of expertise and ability A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques ... (b) Administrative policies and procedures. (1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates; (2) A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator ... and procedures provided in Subpart E, 205.404 Granting certification, § 205.405 Denial of certification; 205.406 Continuation of Certification	Compared to ISO NOP does not require CBs to specify the conditions for suspension or withdrawal; NOP itself outlines the procedure under § 205.662 Noncompliance procedure for certified operations. NOP only mentions that the CB is entitled to issue corrective actions in case non-compliances, followed by approval or denial of certification. The differentiation between non-conformities affecting organic integrity and minor non-conformities which can be found in IAC is not made; same applies for specifying a range of sanctions; Taking immediate action in case of serious fraudulent situation addressed in IAC 7.7.5 is not addressed by NOP
175				§ 205.404 Granting certification. (a) Within a reasonable time after completion of the initial on-site inspection, a certifying agent must review the on-site inspection report, the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant. If the certifying agent determines that the organic system plan and all procedures and activities of the applicant's operation are in compliance with the requirements of this part and that the applicant is able to conduct operations in accordance with the plan, the agent shall grant certification. The certification may include requirements for the correction of minor noncompliances within a specified time period as a condition of continued certification.	

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176				<p>§ 205.662 Noncompliance procedure for certified operations.</p> <p>(a) Notification. When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation. Such notification shall provide:</p> <p>(1) A description of each noncompliance;</p> <p>.....</p>	NOP provides for the applicable procedure
177	<b>Internal Audit</b>				
178	4.7 Internal audits and management review	ISO/IEC Guide 65:1996	4.7.1	<p>4.7.1 The certification body shall conduct periodic internal audits covering all procedures in a planned and systematic manner, to verify that the quality system is implemented and is effective.</p> <p>The certification body shall ensure that</p> <p>a) personnel responsible for the area audited are informed of the outcome of the audit;</p> <p>b) corrective action is taken in a timely and appropriate manner; and</p> <p>c) the results of the audit are documented</p>	
179		ISO/IEC Guide 65:1996	4.7.2	<p>4.7.2 The body's management with executive responsibility shall review its quality system at defined intervals which are sufficiently short to ensure its continuing suitability and effectiveness in satisfying the requirements of this Guide and the stated quality policy and objectives. Records of such reviews shall be maintained</p>	
180		IFOAM AC	3.4 Internal audit	<p>3.4.1 The certification body shall conduct periodic internal audits such that covering all procedures are covered in a planned and systematic manner over time, to verify that the certification system is implemented and is effective.</p> <p>The certification body shall ensure that:</p> <p>a. personnel responsible for the audited functions are informed of the outcome of the audit;</p> <p>b. corrective actions are taken in a timely and appropriate manner;</p> <p>c. the results of the audit are documented</p>	
181				<p>3.4.2 The certification body shall review the management system at defined intervals. Records of such reviews shall be maintained</p>	
182			3.4.3	<p>3.4.3 The certification body shall conduct performance reviews of all inspection and certification personnel including employed inspectors at least annually. Records of the outcome shall be maintained</p>	is covered by ISO 4.5.3, however the requirements to conduct performance reviews at least annually is additional to ISO 65
183			3.4.4	<p>3.4.4 In the case of frequently used contracted inspectors, the inspectors shall be given periodic feedback on performance</p>	feedback specific for IAC requirement and can not be found in ISO 65
184				<p>§ 205.501 General requirements for accreditation.</p> <p>(a) A private or governmental entity accredited as a certifying agent under this subpart must</p> <p>...</p> <p>(6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;</p> <p>(7) Have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any noncompliances with the Act and the regulations in this part that are identified in the evaluation;</p>	Although NOP requires certifying agents to conduct performance evaluation and annual programme evaluation there are no requirements to follow documented procedures and that the outcome shall be documented and communicated.
185					
186	<b>Public Access to information</b>				
187	4.8 Documentation	ISO/IEC Guide 65:1996	4.8.1	<p>4.8.1 The certification body shall provide (through publications, electronic media or other means), update at regular intervals, and make available on request, the following:</p> <p>a) information about the authority under which the Certification body operates;</p> <p>b) a documented statement of its product certification system, including its rules and procedures for granting, maintaining, extending, suspending and withdrawing certification;</p> <p>c) information about the evaluation procedures and certification process related to each product certification system;</p> <p>d) a description of the means by which the organization obtains financial support and general information on the fees charged to applicants and to suppliers of certified products;</p> <p>e) a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted.</p> <p>f) information about procedures for handling complaints, appeals and disputes;</p> <p>g) a directory of certified products and their suppliers.</p>	

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188	Document control	ISO/IEC Guide 65:1996	4.8.2	4.8.2 The certification body shall establish and maintain procedures to control all documents and data that relate to its certification functions. These documents shall be reviewed and approved for adequacy by appropriately authorized and competent personnel prior to issuing any documents following initial development or any subsequent amendment or change being made. A listing of all appropriate documents with the respective issue and/or amendment status identified shall be maintained. The distribution of all such documents shall be controlled to ensure that the appropriate documentation is made available to personnel of the certification body or suppliers when they are required to perform any function relating to the certification body's activities.	
189		IIFOAM AC	5.2 Public access to information	5.2.1 The certification body shall make publicly available, through print and or electronic media, up to date information on the following: a. information describing the authority under which the certification body provides its certification service; b. the requirements and procedures, (or a description of the procedures) for evaluation of the inspection report and approval, continuation or extension of certification; c. the requirements and procedures for suspension and withdrawal of certification d. the standards to which certification is granted; e. a description of the certification body's sources of income and clear indications of the fees charged to applicants and current licensed operators; f. a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted;	IAC refers to contracted production
190		IAC text continuation		g. procedures for handling complaints and appeals; h. a current list of certified operators, including name and location and the scope of the certification; if an operator is certified as a group it shall be identified as such i. a current listing of contracted production parties, shall also be available although this may be a general list without linkage to the certified operator	
191			5.3. Document control	5.3.1 The certification body shall maintain a documented system for the control of all documentation relating to the certification system and shall ensure that: a. the current issues of the appropriate documentation are available at relevant locations; b. all changes of documents are covered by the correct authorization; c. all changes are processed in a manner which will ensure direct and speedy action; d. superseded documents are removed from use throughout the organization; e. all affected parties are notified of changes; f. there is a register of all appropriate documents with the respective issue identified; g. there is a determination of which documents are available to the public and which are not; h. documentation clearly indicates its date of implementation.	IAC requires indication of date of implementation and CBs determination which documents are publicly available and which are not
192				§205.504 Evidence of expertise and ability (b) administrative policies and procedures .. (5) A copy of the procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request: (i) Certification certificates issued during the current and 3 preceding calendar years; (ii) A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years; (iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years; and (iv) Other business information as permitted in writing by the producer or handler; and (6) A copy of the procedures to be used for sampling and residue testing pursuant to	NOP does not require certifying agents to make specific documents publicly available (procedural documents finances etc.) Ist only requested that Certifying agents shall make available for the public certificates issued list of certified operators and products and also results of laboratory analyses for residues of prohibited substances (can not be found in any other regulation)
193			document control		a document control system is not adressed by NOP
194				procedures for granting, maintaining, extending, suspending and withdrawing certification: see § 205.662 Noncompliance procedure for certified operations.	NOP does not request CBs to define procedures for for suspension and withdrawal of certification; NOP itself outlines the applicable noncompliance procedure for certified operations. see § 205.662 Noncompliance procedure for certified operations.
195	Records				

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196	4.9 Records	ISO/IEC Guide 65:1996	4.9.1	The certification body shall maintain a record system to suit its particular circumstances and to comply with existing regulations. The records shall demonstrate that the certification procedures have been effectively fulfilled, particularly with respect to application forms, evaluation reports, surveillance activities and other documents relating to granting, maintaining, extending, suspending or withdrawing certification. The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. The records shall be kept for a period of time so that continued confidence may be demonstrated for at least one full certification cycle, or as required by law.	
197		ISO/IEC Guide 65:1996	4.9.2	The certification body shall have a policy and procedures for retaining records for a period consistent with its contractual, legal or other obligations. The certification body shall have a policy and procedures concerning access to these records consistent with 4.10.1. NOTE 4: The question of the length of time for retention of records requires specific attention in the light of legal circumstances and recognition arrangements	
198		IFOAM AC	5.4.1; 5.4.3,	5.4.1 The certification body shall maintain and have policies and procedures governing their management. The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. 5.4.3 The records shall be sufficiently comprehensive so as to demonstrate that the procedures for certification decisions are properly applied	
199		IFOAM AC	5.4.5	All records shall be safely stored and held secure and in confidence to the operator, for a period not less than five years. Computerized records shall be backed-up regularly.	IAC stipulates a minimum period of 5 years for storage and points out electronic data security
200	records retrieval	IFOAM AC	5.4.2	Operator files shall be up to date and contain all relevant information, including inspection reports, history and product specifications	not addressed by ISO
201		IFOAM AC	5.4.7	5.4.7 The record keeping system shall be transparent and enable easy retrieval of information	not addressed by ISO
202	separate records	IFOAM AC	5.4.4	5.4.4 Separate records shall be kept for major violations and non-conformities and resulting sanctions, precedents, exceptions, appeals, and complaints, in a way that enables easy retrieval of data	ISO requires keeping records for "all appeals, complaints and disputes and does not address separate documentation of sanctions, precedents or exceptions
203	signatures in records	IFOAM AC	5.4.6	Inspection reports, certification decisions, certificates and other relevant records shall be signed by the authorized persons	not addressed by ISO
204	operator access to records	IFOAM AC	5.4.8	5.4.8 Operators shall have the right to have copies of inspection findings and other documentation related to the certification of their production, unless the documents are confidential (i.e. filed complaints, confidential sections of inspection reports)	not addressed by ISO
205		NOP		§ 205.504 Evidence of expertise and ability (b) Administrative policies and procedures. ... (3) A copy of the procedures to be used for complying with the recordkeeping requirements set forth in § 205.501(a)(9); § 205.501 General requirements for accreditation, (a)(9): (9) Maintain all records pursuant to § 205.510(b) and make all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State organic program's governing State official	Compared to ISO and IAC there are no specific requirements covering a "record system" in order to demonstrate that the system is implemented effectively; Only length of storage is addressed.
206		NOP		§ 205.510 Annual report, recordkeeping, and renewal of accreditation. (b) Recordkeeping. Certifying agents must maintain records according to the following schedule: (1) Records obtained from applicants for certification and certified operations must be maintained for not less than 5 years beyond their receipt; (2) Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation; and (3) Records created or received by the certifying agent pursuant to the accreditation requirements of this subpart F, excluding any records covered by §§ 205.510(b)(2), must be maintained for not less than 5 years beyond their creation or receipt.	
207					
208	Confidentiality				
209	4.10 Confidentiality	ISO/IEC Guide 65:1996	4.10.1	The certification body shall have adequate arrangements consistent with applicable laws to safeguard confidentiality of the information obtained in the course of its certification activities at all levels of its organization, including committees and external bodies or individuals acting on its behalf.	
210		ISO/IEC Guide 65:1996	4.10.2	Except as required in this Guide or by law, information gained in the course of certification activities about a particular product or supplier shall not be disclosed to a third-party without the written consent of the supplier. Where the law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided as permitted by the law.	

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211	Confidentiality provisions	IFOAM AC	4.1.1	4.1.1 The certification body shall have adequate arrangements to ensure confidentiality of the information regarding specific operators obtained in the course of certification activities at all levels of its organization, including committees, contracted bodies and individuals	
212		IFOAM AC	4.1.2-4.1.4	4.1.2 These arrangements shall include the requirement for all personnel to sign a confidentiality agreement and the establishment of a confidentiality policy. 4.1.3 This policy shall <ul style="list-style-type: none"> <li>• specify the type of information that is not covered by confidentiality, such as name and address of operators, and</li> <li>• identify the third parties that may have access to confidential information such as accreditation bodies.</li> <li>• require the CB to inform operators of who the parties are</li> <li>• state potential requirements for disclosure of information under the law.</li> <li>• require written consent in other cases.</li> </ul> 4.1.4 Where law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided	<i>requirements for personnel to commit to confidentiality is covered in ISO 5.2.2 Deviant to ISO, IAC allows for additional disclosure of information providing this is defined and published in its rules; however it is transparent to operators because applicants are required to agree to all CBs rules.</i>
213	disclosure of information	EU Regulation	Article 9, 7. (b)	(The inspection authority and the approved inspection bodies referred to in paragraph 1 shall): (b) not disclose information and data they obtain in their inspection activity to persons other than the person responsible for the undertaking concerned and the competent public authorities. However, upon request duly justified by the necessity to guarantee that the products have been produced in accordance with this regulation, they shall exchange information with other inspection authorities or approved inspection bodies relevant information on the results of their inspection. They may also exchange the above mentioned information on their own initiative.	<i>Deviant to ISO and IAC requirements EU Reg grants CBs the right to exchange information without consent of the operator concerned; (proactive) exchange is restricted to cases where organic integrity is threatened. Request for CBs to cooperate with each other for information exchange is additional to ISO and IAC as well.</i>
214		NOP		§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: .. (10) Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in § 205.504(b)(5);	<i>Different to ISO and IAC confidentiality provisions are addressed more general without specifying e.g. that personnel is requested to commit to confidentiality</i>
215		NOP		§ 205.504 Evidence of expertise and ability. A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques (b) Administrative policies and procedures (4) A copy of the procedures to be used for maintaining the confidentiality of any business-related information as set forth in § 205.501(a)(10);	
216	CB personnel and resources				
217	5. Certification body personnel 5.1 General	ISO/IEC Guide 65:1996	5.1.1	5.1.1 The personnel of the certification body shall be competent for the functions they perform, including making required technical judgments, framing policies and implementing them.	
218		ISO/IEC Guide 65:1996	5.1.2	5.1.2 Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. These instructions shall be maintained up to date.	
219	1.4 Resources	Ifoam AC	1.4.2, 1.4.3, 1.4.6	1.4.2 The certification body personnel shall have the necessary education, training, technical knowledge and experience for performing functions relating to the type, range and volume of work. 1.4.3 Personnel including contracted inspectors shall be assigned to inspection and certification work that is appropriate to their skills 1.4.6 The body responsible for certification decisions shall ensure that all certification decisions are based on competence in all areas for which certification is granted.	more descriptive compared to ISO; however not adding additional aspects
220		Ifoam AC	1.4.4, 1.4.5	1.4.4 Personnel shall have job descriptions describing their duties and responsibilities 1.4.5 Personnel shall have documented work instructions for complex or critical certification and inspection functions	

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221		NOP		<p>§ 205.501 General requirements for accreditation.</p> <p>(a) A private or governmental entity accredited as a certifying agent under this subpart must:</p> <p>...</p> <p>(4) Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;</p> <p>(5) Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned</p>	documented instructions/ job descriptions not addressed in NOP
222		NOP			
223	Qualification				
224	5.2 Qualification Criteria	ISO/IEC Guide 65:1996	5.2.1	5.2.1 In order to ensure that evaluation and certification are carried out effectively and uniformly, the minimum relevant criteria for the competence of personnel shall be defined by the certification body.	
225		ISO/IEC Guide 65:1996	5.2.2	<p>5.2.2 The certification body shall require its personnel involved in the certification process to sign a contract or other document by which they commit themselves</p> <p>a) to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interest; and</p> <p>b) to declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are to be assigned.</p> <p>The certification body shall ensure that, and document how, any contracted personnel for their own part, and on the part of their employer if any, satisfy all the requirements for personnel outlined in this Guide.</p>	
226		ISO/IEC Guide 65:1996	5.2.3	<p>5.2.3 Information on the relevant qualifications, training and experience of each member of the personnel involved in the certification process shall be maintained by the certification body. Records of training and experience shall be kept up to date, in particular the following:</p> <p>a) name and address;</p> <p>b) organization affiliation and position held;</p> <p>c) educational qualification and professional status.</p> <p>d) experience and training in each field of the certification body's competence;</p> <p>e) date of most recent updating of records-,</p> <p>f) performance appraisal.</p>	
227		IFOAM AC	1.4.2	1.4.2 The certification body personnel shall have the necessary education, training, technical knowledge and experience for performing functions relating to type, range and volume of work performed	<i>IAC is lacking the requirement to define minimum criteria for the competence of personnel.</i>
228		IFOAM AC	1.4.7, 1.4.12	<p>1.4.7 The certification body shall require all persons involved in the certification process to sign a contract or other document by which they commit themselves to the rules and procedures of the certification body</p> <p>1.4.12 When a certification body subcontracts work related to certification to an external body, or person, an agreement covering the arrangements shall be drawn up. This shall include the requirement to comply with all relevant aspects of these criteria</p>	<i>in addition to 1.4.7 see IAC 1.3.16-1.3.18, conflict of interest of individuals</i>
229		IFOAM AC	1.4.8	Records of the qualifications and training of all personnel shall be maintained	<i>ISO is more specific, listing specific elements of the requested documentation</i>
230	Conflict of Interest of Individuals		1.3.16, 1.3.17	<p>1.3.16 The certification body shall ensure that a declaration of interest is updated annually by all persons involved in certification, inspection and appeals as well as by the board. Such declarations shall be on file and take into account both direct and indirect interests. The certification body shall review the declarations and identify what constitutes a conflict.</p> <p>1.3.17 All persons with a conflict of interest shall be excluded from work, discussion and decisions in all stages of the certification process related to the potential conflict. The exclusion of such persons shall be recorded in minutes or other records.</p>	<i>ISO 5.2.2 b requires declaration of association whereas IAC 1.3.16 requires declaration of interests (both direct and indirect interests)</i>

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231			1.3.18	1.3.18 The certification body shall require persons engaged in inspection, certification and appeals to agree in writing to abstain from participating in work regarding operators with whom they have personal relations or those with whom they have had business relationships (either trade or advisory) in the past two years. The certification body shall require persons engaged in inspection to report on any new interests regarding the operation for a period of one year after the inspection. The certification body shall determine whether the new relations may have affected the impartiality of any work submitted by inspectors or certification personnel.	<i>IAC 1.3.18 considers also conflicts that may arise following the work for a period of one year; this is not addressed in ISO 5.2.2 b</i>
232	Qualification criteria	NOP			<i>NOP does not require CBs to define "Minimum relevant criteria for the competence of personnel"</i>
233	commitment to CB rules				<i>NOP does not request that personnel commit themselves to rules or procedures of the CB as required in ISO 5.2.2 a9</i>
234				§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must (11) Prevent conflicts of interest by: (i) Not certifying a production or handling operation if the certifying agent or a responsibly connected party of such certifying agent has or has held a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12-month period prior to the application for certification; (ii) Excluding any person, including contractors, with conflicts of interest from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which such person has or has held a commercial interest.	<i>requirements to prevent conflict of interest situation are more restrictive compared to ISO and IAC, prohibiting the certification of an operation if the CB or connected party has or has held commercial interest</i>
235					
236	Changes in the Certification requirements				
237		ISO/IEC Guide 65:1996	6.	6 Changes in the certification requirements The certification body shall give due notice of any changes it intends to make in its requirements for certification. It shall take account of views expressed by interested parties before deciding on the precise form and effective date of the changes. Following decision on, and publication of, the changed requirements, it shall verify that each supplier makes any necessary adjustments within such time as, in the opinion of the certification body, is reasonable.	
238		IIFOAM AC	7.10.1-7.10.2	7.10.1 The certification body shall ensure that each certified operator be notified of changes in the certification requirements without unnecessary delay 7.10.2 The certification body shall verify the operator's implementation in a timely manner	<i>ISO 65 requires notification of intended changes; in the following, views expressed by interested parties shall be taken into account There is no IAC criteria comparable to this; IAC requires operators to be informed about changes once they have been decided without undue delay; verification of changes is the same</i>
239		NOP			<i>Not adressed</i>
240	Appeals, complaints, disputes				
241		ISO/IEC Guide 65:1996	7. Appeals, complaints and disputes	7.1 Appeals, complaints and disputes brought before the certification body by suppliers or other parties shall be subject to the procedures of the certification body. 7.2 Each certification body shall a) keep a record of all appeals, complaints and disputes and remedial actions relative to certification; b) take appropriate subsequent action; c) document the action taken and its effectiveness.	

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242		IFOAM AC	3.5 Complaints	<p>3.5.1 The certification body shall have procedures for consideration of complaints brought by operators or third parties concerning its own performance or concerning the compliance of certified operators with the standards.</p> <p>3.5.2 Complaints shall be dealt with in a timely and efficient manner</p> <p>3.5.3 When a complaint is resolved, a documented resolution shall be made. The complainant shall be informed of the general outcome of the complaint in a way which does not prejudice the confidentiality of the party concerned.</p> <p>3.5.4 The certification body shall</p> <ul style="list-style-type: none"> <li>a. keep a record of all complaints and resulting corrective actions related to certification;</li> <li>a. investigate and take appropriate subsequent action regarding complaints related to certification</li> <li>b. review and take any necessary corrective action to the certification system</li> <li>c. keep a record of all complaints and resulting actions</li> </ul>	<p><i>IAC includes specific requirements regarding complaints resolution whilst ISO generally requires the CB to take appropriate subsequent action</i></p> <p><i>IAC differentiates two types of complaints</i></p> <p><i>language: IAC considers "disputes" as complaints</i></p>
243			7.8 Appeals	<p>7.8.1 The certification body shall have procedures for the consideration of appeals against its certification decisions.</p> <p>7.8.2 Appeals shall be dealt with in a timely and efficient manner</p> <p>7.8.3 When an appeal is decided, a documented resolution shall be made and forwarded to the appellants</p> <p>7.8.4 The certification body shall:</p> <ul style="list-style-type: none"> <li>a. keep a record of all appeals</li> <li>b. take appropriate subsequent action;</li> <li>c. document the action taken and its effectiveness</li> </ul>	<p><i>not addressed by ISO: requirement to deal appeals/complaints in a timely and efficient manner and to forward resolution to the complainant/appellant</i></p>
244		NOP		<p>§ 205.663 Mediation.</p> <p>Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent. If the certifying agent rejects the request for mediation, the certifying agent shall provide written notification to the applicant for certification or certified operation. The written notification shall advise the applicant for certification or certified operation of the right to request an appeal, pursuant to § 205.681, within 30 days of the date of the written notification of rejection of the request for mediation. If mediation is accepted by the certifying agent, such mediation shall be conducted by a qualified mediator mutually agreed upon by the parties to the mediation. If a State organic program is in effect, the mediation procedures established in the State organic program, as approved by the Secretary, will be followed. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session.</p>	
245		NOP		<p>§ 205.681 Appeals.</p> <p>(a) Certification appeals. An applicant for certification may appeal a certifying agent's notice of denial of certification, and a certified operation may appeal a certifying agent's notification of proposed suspension or revocation of certification to the Administrator</p>	<p><i>NOP provides the appeals procedures - as a result they are comparable with those procedures CBs shall develop according to ISO/IAC; however NOP is lacking any requirements regarding the documentation of appeals.</i></p>
246	Application for certification				
247	8. Application for certification	ISO/IEC Guide 65:1996	8.1 Information on the procedure	<p>8.1.1 The certification body shall provide to applicants an up-to-date detailed description of the evaluation and certification procedures, appropriate to each certification scheme, and the documents containing the requirements for certification, the applicants' rights and duties of suppliers which have certified products (including fees to be paid by applicants and suppliers of certified products).</p>	
248		ISO/IEC Guide 65:1996		<p>8.1.2 The certification body shall require that a supplier</p> <ul style="list-style-type: none"> <li>a) always complies with the relevant provisions of the certification Programme;</li> <li>b) makes all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;</li> <li>c) makes claims regarding certification only in respect of the scope for which certification has been granted;</li> <li>d) does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification which the certification body may consider misleading or unauthorized;</li> </ul>	

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249		ISO text continuation		e) upon suspension or cancellation of certification, discontinues its use of all advertising matter that contains any reference thereto and returns any certification documents as required by the certification body f) uses certification only to indicate that products are certified as being in conformity with specified standards; g) endeavors to ensure that no certificate or report nor any part thereof is used in a misleading manner; h) in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of the certification body	
250	additional explanation to applicants		8.1.3	8.1.3 When the desired scope of certification is related to a specific system or type of system operated by the certification body, any explanation needed shall be provided to the applicant.	
251			8.1.4	8.1.4 If requested, additional application information shall be provided to the applicant	
252	Information to Applicants	I FOAM AC	6.1 Application procedures	6.1.1 The certification body shall ensure that each applicant or certified operator has at the time of application: a. a current version of the applicable standards; b. an adequate description of the inspection, certification and appeals procedures; c. a contract or sample copy of the contract or a description of the contractual conditions; d. a copy of the fee schedule	ISO requires information "appropriate" to the each certification system; IAC requires "adequate" description of the inspection, certification and appeals procedures - no difference, just wording
253	Operator Obligations	I FOAM AC	6.1.4	6.1.4 The certification body shall require the operators to sign statements in the application form or elsewhere, obliging them to: a. agree to comply with the requirements for certification including a commitment to comply with the standards, and to supply any information needed for evaluation of the production to be certified; b. provide the right of access to all appropriate facilities including any non-organic production in the unit, or related (by ownership or management) units in the proximity, to both certification and accreditation personnel. c. provide access to all relevant documentation including financial records to both certification and accreditation personnel	IAC refers to non-organic areas
254			Annex III, 3. Initial Inspection		
255	Rules on use of any certification claims	I FOAM AC	7.6. Use of Licenses, Certificates and certification Marks	7.6.4 The certification body shall establish requirements concerning the use of its certification mark or other reference to the certification. These criteria shall require that the operator only makes claims regarding certification which are consistent with the scope of the certification that has been granted	equal to ISO 8.1.2 d, e, f, h
256		I FOAM AC		7.6.6 Incorrect references to the certification system or misleading use of licenses, certificates or certification marks shall be dealt with by suitable remedial actions	
257	withdrawal of certification mark	I FOAM AC		7.6.8 The certification body shall have documented procedures for withdrawal and cancellation of contracts, certificates and certification marks. These procedures shall require the operator to discontinue use of certificates and certification marks	says the same as ISO 8.1.2e
258					ISO 8.1.3 and 8.1.4 (additional explanation to applicants) not addressed by IAC
259	Application information	NOP	Subpart F, Accreditation	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: (8) Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part;	NOP requires certifying agents to provide "sufficient" information; the requirement that applicants shall sign statements to adhere to the Regulation and requirements is not addressed

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260		NOP	Subpart E Certification	<p>§ 205.400 General requirements for certification.</p> <p>A person seeking to receive or maintain organic certification under the regulations in this part must:</p> <p>(a) Comply with the Act and applicable organic production and handling regulations of this part;</p> <p>(b) Establish, implement, and update annually an organic production or handling system plan that is submitted to an accredited certifying agent as provided for in § 205.200;</p> <p>(c) Permit on-site inspections with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices by the certifying agent as provided for in § 205.403;</p> <p>(d) Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State organic program's governing State official, and the certifying agent access to such records during normal business hours for review and copying to determine compliance with the Act and the regulations in this part, as provided for in § 205.104;</p>	there is no requirement that CBs shall obtain the operators' confirmation to comply with the rule; however it is required by law; in addition operators are required to confirm the information compiled in the organic production and handling system plan; access also to non-certified production and handling areas is addressed equal to IAC requirement; same applies for documentation
261	Rules on Labels	NOP		<p>Subpart D - Labels, Labeling, and Market Information</p> <p>§ 205.300 Use of the term, "organic."</p> <p>(a) The term, "organic," may only be used on labels and in labeling of raw or processed agricultural products, including ingredients, that have been produced and handled in accordance with the regulations in this part. The term, "organic," may not be used in a product name to modify a nonorganic ingredient in the product.</p> <p>....</p> <p>And</p> <p>§ 205.311 USDA Seal.</p> <p>(a) The USDA seal described in paragraphs (b) and (c) of this section may be used only for raw or processed agricultural products described in paragraphs (a), (b), (c)(1), and (c)(2) of § 205.301</p>	Labelling requirements are addressed in the rule directly;
262	application form				
263		ISO/IEC Guide 65:1996	8.2 The application 8.2.1	<p>8.2.1 The certification body shall require completion of an official application form, signed by a duly authorized representative of the applicant, in which or attached to which are the following:</p> <p>a) the scope of the desired certification.</p> <p>b) a statement that the applicant agrees to comply with the requirements for certification and to supply any information needed for evaluation of products to be certified.</p>	
264		ISO/IEC Guide 65:1996	8.2.2	<p>8.2.2 The applicant, as a minimum, shall provide the following information:</p> <p>a) corporate entity, name, address and legal status;</p> <p>b) a definition of the products to be certified, the certification system, and the standards against which each product is to be certified if known to the applicant</p>	
265	Application form	IIFOAM AC	6.1.2	<p>6.1.2 The certification body shall require completion of an official application form, signed by the applicant or a duly authorized representative of the applicant. This shall determine at least the following information:</p> <p>a. The scope of the desired certification;</p> <p>b. Sufficient information about the production system to enable appropriate assignment of the inspector and proper preparation by the inspector</p>	description of the "production system"
266		IIFOAM AC	6.1.4	<p>6.1.4 The certification body shall require operators to sign statements in the application form or elsewhere, obliging them to:</p> <p>a. agree to comply with the requirements for certification including a commitment to comply with the standards, and to supply any information needed for evaluation of the production to be certified;</p> <p>b. ...</p>	
267	Operator documentation	IIFOAM AC	6.1.5	<p>6.1.5 The certification body shall specify the documentation to be maintained by the operator to enable verification of compliance, and shall specify which records shall be available and held in a form that enables verification to take place.</p>	not addressed by ISO
268			6.1.6	<p>6.1.6 The certification body shall require documented procedures defining the manner of production or processing where the absence of such procedures could adversely affect the organic quality</p>	not addressed by ISO

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269	Initial inspection	EU Regulation	Annex III, 3. Initial inspection	3. Initial inspection When the inspection arrangements are first implemented the operator responsible must draw up - a full description of the unit/or premises and/or activity, - all the practical measures to be taken at the level of the unit and/or premises and/or activity to ensure compliance with this regulation, and in particular with the requirements in this annex. The description and practical measures concerned must be contained in a declaration, signed by the responsible operator. ....	requirement applies to operators however CBs are responsible to ensure that operators meet requirements regarding documentation when "the inspection arrangements are first implemented" (compare with IAC 6.1.5) EU Reg is more descriptive compared to ISO and IAC; IAC generally requires CBs to specify the documentation maintained by the operator without providing further details
270			Annex III, 6. Documentary accounts	6. Documentary accounts Stock and financial records must be kept in the unit or premises, to enable the operator and the inspection body or authority to trace: - the supplier... The data in the accounts must be documented with appropriate justification documents The accounts must demonstrate the balance between the input and the output.	compare with IAC 6.1.5 (kind of operator documentation not specified by ISO EU reg here focuses here on documentation enabling the inspection body to carry out input output analysis
271					
272		NOP	Subpart E	§ 205.401 Application for Certification. A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information: (a) An organic production or handling system plan, as required in § 205.200; (b) The name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf;	
273		NOP		(c) The name(s) of any organic certifying agent(s) to which application has previously been made; the year(s) of application; the outcome of the application(s) submission, including, when available, a copy of any notification of noncompliance or denial of certification issued to the applicant for certification; and a description of the actions taken by the applicant to correct the noncompliances noted in the notification of noncompliance, including evidence of such correction; and (d) Other information necessary to determine compliance with the Act and the regulations in this part.	
274		NOP		§ 205.201 Organic production and handling system plan. (a) The producer or handler of a production or handling operation, except as exempt or excluded under § 205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:	
275		NOP text continuation		(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed; (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable; (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; (4) A description of the recordkeeping system implemented to comply with the requirements established in § 205.103; (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.	Compared to IAC and ISO requirements the information requested in the Organic production and handling plan is much more descriptive whereas IAC leaves it open (sufficient information about the production system to enable appropriate assignment of the inspector ...; specify documentation to be maintained by the operator that enables verification to take place.
276	Preparation for evaluation				
277	9. Preparation for evaluation	ISO/IEC Guide 65:1996	9.1	9.1 Before proceeding with the evaluation, the certification body shall conduct, and maintain records of, a review of the application for certification to ensure that a) the requirements for certification are clearly defined, documented and understood; b) any difference in understanding between the certification body and the applicant is resolved., and c) the certification body has the capability to perform the certification service with respect to the scope of the certification sought and, if applicable, the location of the applicant's operations and any special requirements such as the language used by the applicant.	ISO 9.1.b to resolve any difference in understanding before proceeding the application is not addressed by IAC

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278		ISO/IEC Guide 65:1996	9.2	9.2 The certification body shall prepare a plan for its evaluation activities to allow for the necessary arrangements to be managed.	not addressed by IAC
279		ISO/IEC Guide 65:1996	9.3	9.3 The certification body shall assign personnel appropriately qualified to perform the tasks for the specific evaluation. Personnel shall not be assigned if they have been involved in, or been employed by a body involved in, the design, supply, installation or maintenance of such products in a manner and within a time period which could conflict with impartiality.	
280		ISO/IEC Guide 65:1996	9.4	9.4 To ensure that a comprehensive and correct evaluation is carried out, the personnel involved shall be provided with the appropriate working documents.	
281	6.2 Preparation for Inspection	IFOAM AC	6.2.1	6.2.1 The certification body shall conduct a review of the application for certification to ensure that the requirements for certification are clearly understood and that the scope of certification sought is appropriate to the applicant.	<i>IAC does not require to maintain records of the review to resolve any differences in understanding (ISO 9.1b) before proceeding with the evaluation is not addressed by IAC</i>
282		IFOAM AC	6.2.2	6.2.2 For complex operations and foreign operations located in regions not usually covered by the certification body, the certification body shall assess whether it has the capability to perform the certification service with respect to the scope of the certification sought	
283		IFOAM AC			ISO 9.2 to prepare an evaluation plan is not addressed in IAC
284	Assignment of inspectors	IFOAM AC	1.4.3	Personnel, including contracted inspectors, shall be assigned to inspections and certification work that is appropriate to their skills	
285		IFOAM AC	6.2.4	The assignment of the inspector shall take into account any possible conflict of interest.	regarding conflict of interest provisions see also IAC 1.3.18
286		IFOAM AC	6.2.3	6.2.3 The certification body shall provide the inspector with sufficient information to prepare for the inspection.	
287	assignment rotation	IFOAM AC	6.2.5	6.2.5 The assignment of the inspector shall ensure that the same inspector shall as a rule not be assigned to an operator for more than 4 consecutive years and under no circumstances for more than 5 consecutive years	not addressed by ISO
288	assignment operator objection	IFOAM AC	6.2.6	6.2.6 Operators shall have neither the right to choose nor to recommend inspectors. Except for cases of unannounced visits, operators shall have the right to be informed about the identity of the inspector before the inspection visit. Operators shall in any case have the right to raise objections based on conflict of interest or other reasons. The certification body shall rule whether the reasons are accepted.	not addressed by ISO
289		NOP	Subpart E Certification	§ 205.402 Review of application. (a) Upon acceptance of an application for certification, a certifying agent must: (1) Review the application to ensure completeness pursuant to § 205.401; (2) Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part; (3) Verify that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification, pursuant to § 205.405, has submitted documentation to support the correction of any noncompliances identified in the notification of noncompliance or denial of certification, as required in § 205.405(e); and (4) Schedule an on-site inspection of the operation to determine whether the applicant qualifies for certification if the review of application materials reveals that the production or handling operation may be in compliance with the applicable requirements of subpart C of this part. (b) The certifying agent shall within a reasonable time: (1) Review the application materials received and communicate its findings to the applicant;	
290		NOP	Subpart F Accreditation	§ 205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: ... (18) Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliances;	covers all aspects ISO is addressing
291	Evaluation				
292	10. Evaluation	ISO/IEC Guide 65:1996	10. Evaluation	The certification body shall evaluate the products of the applicant against the standards covered by the scope defined in its application against all certification criteria specified in the rules of the scheme.	
293	6.3 Visit Procedures	IFOAM AC	6.3.1	6.3.1 The organic management systems of the operator shall be evaluated against the specified standards and certification requirements	
294			6.3.2	6.3.2 Inspection procedure shall follow a specific protocol to facilitate a nondiscriminatory and objective inspection procedure	not addressed by ISO

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295			6.3.3	6.3.3 The routine inspection procedure shall be documented and shall at least include: a. assessment of production or processing system of operator by means of visits to facilities, fields, and storage units; b. verification of the most recent information provided to the certification body by the operator c. identification and investigation of areas of risk; d. review of records and accounts; e. production/sales reconciliation on farms; f. an input/output reconciliation and trace back audits in processing and handling; g. interviews with responsible persons including an exit interview; h. verification that changes that have taken place in the standards and requirements of the certification body have been effectively implemented by the operator; i. residue sampling in accordance with the certification body's sampling policy; j. verification that previously imposed conditions have been fulfilled	Evaluation procedures not specified or addressed by ISO
296			6.3.4	6.3.4 The inspection, including document review shall include non-organic units where there is reason for doing so	not addressed by ISO however sector specific requirement
297	Sampling and testing	I FOAM AC	6.4 Sampling and Testing	6.4.1 The certification body shall have documented policies and procedures on residue testing, genetic testing ( see 6.7.11) and other analysis that shall at least include: a. indication of the cases in which samples shall be taken; b. the requirement that where use of a substance prohibited by the standards is suspected and samples may provide supporting evidence, then samples shall be taken for analysis; c. the requirement that where standards set limits on residues or contamination in products, inputs or soil, analysis shall be made as appropriate; d. instructions to inspectors on sampling requirements and methods; e. indication of responsibility for payment of sampling. 6.4.2 Analyses shall be done by competent laboratories.	IAC specifies testing in the context of visit procedures; more detailed than ISO requirements (compare also with ISO 1.2)
298	Inspection system	EU regulation	Article 9	3. The inspection system shall comprise at least the application of the precautionary and inspection measures specified in Annex III	
299	Inspection visit		Annex 3, 5.	5. Inspection Visit	
300					
301					
302		NOP	Subpart E Certification	§ 205.403 On-site inspections. (a) On-site inspections. (1) A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. (2) (i) A certifying agent may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part. (ii) The Administrator or State organic program's governing State official may require that additional inspections be performed by the certifying agent for the purpose of determining compliance with the Act and the regulations in this part. (iii) Additional inspections may be announced or unannounced at the discretion of the certifying agent or as required by the Administrator or State organic program's governing State official.	NOP provides for detailed requirements regarding the inspection procedures; different to IAC NOP does not address input/output, production/sales reconciliation
303				(b) Scheduling. (1) The initial on-site inspection must be conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the requirements of subpart C of this part: Except, That, the initial inspection may be delayed for up to 6 months to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed. (2) All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C of this part can be observed, except that this requirement does not apply to unannounced on-site inspections.	

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304				(c) Verification of information. The on-site inspection of an operation must verify: (1) The operation's compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§ 205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples.	
305				(d) Exit interview. The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern. (e) Documents to the inspected operation. (1) At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken. (2) A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.	
306				§ 205.670 Inspection and testing of agricultural product to be sold or labeled "organic." ... (b) The Administrator, applicable State organic program's governing State official, or the certifying agent may require preharvest or postharvest testing of any agricultural input used or agricultural product to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. ...	
307	Evaluation report				
308	Evaluation report	ISO/IEC Guide 65:1996	11 Evaluation report	11 Evaluation report The certification body shall adopt reporting procedures that suit its needs but, as a minimum, these procedures shall ensure that a) personnel appointed to evaluate the conformance of the products shall provide the certification body with a report of findings as to the conformity with all the certification requirements. b) a full report on the outcome of the evaluation is promptly brought to the applicant's notice by the certification body, identifying any nonconformities that have to be discharged in order to comply with all of the certification requirements and the extent of further evaluation or testing required. If the applicant can show that remedial action has been taken to meet all the requirements within a specified time limit, the certification body shall repeat only the necessary parts of the initial procedure.	IAC does not contain requirement that a full report of the outcome of the evaluation is promptly brought to the operator; same applies for the following procedure that the applicant may take corrective action in specified time limits in order to meet all requirements; CB then is allowed to re-evaluate the respective parts only
309	Inspection report	I FOAM AC	6.5 inspection report	6.5.1 Inspection reports shall cover relevant aspects of the production standards, adequately validate the information provided by the operator and indicate any non-conformities. 6.5.2 Inspection reports and written documentation shall indicate the applicable standard(s) and provide sufficiently comprehensive information for the certification body to make competent and objective decisions. 6.5.3 Inspection reports shall follow a decided format to facilitate a non-discriminatory, objective and comprehensive analysis of the production system. 6.5.4 Reports shall be designed to allow for elaboration and analysis by the inspector 6.5.5 Reports shall contain an assessment of risk with regard to loss of organic integrity as well as the inspector's observations regarding conformity with standards. Inspectors shall be able to make recommendations regarding nonconformities but shall not be required to make an overall judgment of whether the operator should be certified	IAC is focusing on "sufficiently comprehensive information" the requirement to use a "decided format" for the inspection report is additional compared to ISO ; Additional to ISO requirements, IAC introduces the requirement to conduct and document a risk assessment and prohibits to require an overall judgment from the inspector
310	record of inspection	I FOAM AC	6.6 record of inspection	6.6.1 The certification body shall require inspectors to record what occurred during the inspection visit. This shall at least include: a. date and duration of inspection; b. persons interviewed; c. fields and facilities visited; d. Type of document audits conducted (input/output; yield/sales; trace back etc).	record of inspection not specified in ISO.

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311		NOP	Subpart E	<p>§ 205.402 Review of application.                      (2) Provide the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed;                      ...                      § 205.403 On-site inspections.                      (e) Documents to the inspected operation.                      ...                      (2) A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.</p>	<p><i>use of inspection report is mentioned; however there are no requirements detailing the "minimum content" and the form of an inspection report (report format, use of standardized formats); review of inspection reports is part of the accreditation procedure; CBs shall submit different inspection formats in order to demonstrate expertise and ability for carrying out certification; although there are no criteria defining the reports</i>  <i>The ISO approach to promptly forward a full evaluation report with all findings including identified non-conformities can not be found;</i>  <i>NOP requires forwarding of on-site inspection report and as part of the certification decision written notification of noncompliance</i></p>
312		NOP	Subpart F	<p>§ 205.504 Evidence of expertise and ability.                      A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques ..                      (d)                      (2) Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during the previous year for each area of operation for which accreditation is requested; and</p>	
313	Decision on Certification				
314	12 Decision on certification	ISO/IEC Guide 65:1996	12 Decision on certification	<p>12.1 The decision as to whether or not to certify a product shall be taken by the certification body on the basis of the information gathered during the evaluation process and any other relevant information.                      12.2 The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body.                      12.3 The certification body shall provide to each supplier offering certified products, formal certification documents such as a letter or a certificate signed by an officer who has been assigned such responsibility. These formal certification documents shall permit identification of the following:                      a) the name and address of the supplier whose products' are the subject of certification;                      b) the scope of the certification granted, including, as appropriate,</p>	
315		ISO text continuation		<p>1) the products certified, which may be identified by type or range of products,                      2) the product standards or other normative documents to which each product or product type is certified,                      3) the applicable certification system;                      c) the effective date of certification, and the term of the certification if applicable.                      12.4 In response to an application for amendment to the scope of a certificate already granted, the certification body shall decide what, if any, evaluation procedure is appropriate in order to determine whether or not the amendment should be made and shall act accordingly</p>	
316	7.2 Certification decision	IFOAM AC	7.2	7.2.1 All certification decisions including the scope shall be objective and transparent and shall be recorded	
317		IFOAM AC	1.3.2	1.3.2 The certification body shall be impartial. Inspection and certification shall be based on objective assessment of relevant factors, following documented procedures	IAC stronger focus on transparency of decision taken; however implementation will achieve the same result
318		IFOAM AC	1.2.2	1.2.2 The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body	
319		IFOAM AC	7.2.2	7.2.2 Following initial certification the certification shall be communicated to the operator. Thereafter, operators shall be kept informed about their certification status	
320	Certificates of conformity	IFOAM AC	7.4 Certificates	<p>7.4 Certificates                      7.4.1 The certification body shall issue certificates confirming conformity of a certified operation. These shall include at least:                      a. the name and address of the operator;                      b. the name and address of the certification body;                      c. the program under which the operator is certified;                      d. the scope of the certification including reference to the applicable standards, the products or product categories, and the certification status (conversion or organic) of each.                      e. the date of issuance;                      f. the period of validity.</p>	
321	changes in certification scope	IFOAM AC	7.5.11	7.5.11 The certification body shall assess the announced scope changes and have criteria for inspection or alternative action	compare with ISO 12.4

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	A	B	C	E	F
322	Transaction certificates	IFOAM AC		7.4.2 Transaction certificates .....	not addressed by ISO
323		IFOAM AC	7.2.3	7.2.3 When certification is denied, withdrawn or suspended, the reasons shall be clearly stated	not addressed by ISO
324		IFOAM AC	7.2.4	7.2.4 If exceptions are granted there shall be criteria and procedures for granting exceptions. Exceptions shall be clearly limited in time and the rationale for any exception shall be properly recorded	not addressed by ISO
325		IFOAM AC	7.2.5	7.2.5 The certification body shall have the right to impose conditions. Where conditions require corrective actions subsequent to certification, timelines shall be imposed. . Mechanisms for monitoring compliance with conditions and restrictions shall be in place	compare with ISO 11b
326	Certification Process	IFOAM AC	7.3.1	7.3.1 The procedures shall ensure that: a. that the certification status of all operators and their production and, where relevant, the scope of existing certification, is indicated throughout the certification process; b. that processing of inspection reports and certification decisions shall be done in a timely manner; c. that processing of any issue related to non-conformities with standards shall be done with highest priority.	not addressed by ISO
327		NOP	Subpart E	§ 205.404 Granting certification. (a) Within a reasonable time after completion of the initial on-site inspection, a certifying agent must review the on-site inspection report, the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant. If the certifying agent determines that the organic system plan and all procedures and activities of the applicant's operation are in compliance with the requirements of this part and that the applicant is able to conduct operations in accordance with the plan, the agent shall grant certification. The certification may include requirements for the correction of minor noncompliances within a specified time period as a condition of continued certification.	equal to ISO 65;
328				(b) The certifying agent must issue a certificate of organic operation which specifies the: (1) Name and address of the certified operation; (2) Effective date of certification; (3) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and (4) Name, address, and telephone number of the certifying agent. (c) Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program's governing State official, or the Administrator.	same as ISO; effective date is addressed; different to IAC, period of validity must not be specified; once a certificate is issued it remains valid until certificate is suspended or revoked by the CB
329	Surveillance				
330	13 Surveillance	ISO/IEC Guide 65:1996	13. Surveillance	13.1 The certification body shall have documented procedures to enable surveillance to be carried out in accordance with the criteria applicable to the relevant certification system. 13.2 The certification body shall require the supplier to inform it about any of the changes cited in 4.6.2 c), such as intended modification to the product, manufacturing process or, if relevant, its quality system, which affect the conformity of the product. The certification body shall determine whether the announced changes require further investigations. If such is the case, the supplier shall not be allowed to release certified products resulting from such changes until the certification body has notified the supplier accordingly. 13.3 The certification body shall document its surveillance activities. 13.4 Where the certification body authorizes the continuing use of its mark on products of a type which have been evaluated, the certification body shall periodically evaluate the marked products to confirm that they continue to conform to the standards.	
331	Surveillance, frequency of scheduled inspection	IFOAM AC	Surveillance Frequency of scheduled inspection 7.5.1	7.5.1 New applicants shall be inspected upon application, before certification. 7.5.2 The certification body shall have a written policy on inspection frequency of already certified operators. The policy shall require that operators are inspected at least annually. Alternatively, (except in the cases of new applicants, operators wholly in conversion or group certification) the policy shall fulfill the following requirements: a. the frequency and type of inspections are based on the risks in the with respect to the individual operator, b. the risk analysis take into account any relevant threat to the organic integrity of the production and products, c. the total number of inspections per calendar year at least equals the total number of already certified operators. d. that no operator is inspected less than once in three calendar years. e. the certification body installs mechanisms to monitor operators to assess their risk level between very spread out inspections.	compare with ISO 13.1 and 13.4: ISO refers to periodic evaluation, IAC requires either annual inspection frequency or alternative determination of inspection frequency based on risk assessment and minimum requirement to ensure that inspection frequency is not less than once in three calendar years

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332	notification of changes	Ifoam AC	7.5.10, 7.5.11	7.5.10 The certification body shall require operators to give notification of significant changes such as modification to the products, the manufacturing process, extension of acreage or changes to management, or ownership. 7.5.11 The certification body shall assess the announced scope changes and have criteria for inspection or alternative action.	compare with ISO 13.2
333	additional inspections	Ifoam AC	7.5.3	7.5.3 There shall be provisions for additional scheduled inspections. The criteria or circumstances when for scheduling more than one inspection annually shall be documented and shall be based on risk analysis taking into account factors such as the type of production, the operator's record of compliance, complexity of production, and risk of non-compliance	additional inspections not addressed by ISO however compare with 13.3
334	timing of inspections	Ifoam AC	7.5.4	7.5.4 Timing of inspections shall not be so regular as to become predictable	not addressed by ISO
335	unannounced inspection	Ifoam AC	7.5.5	7.5.5 The certification body shall have a documented policy requiring unannounced inspections. At a minimum, the policy shall require: a. in the case of a risk-based approach to determine inspection frequency, at least 5% of the operators shall be subject to unannounced inspections; b. in the case of an annual inspection frequency, the number of unannounced inspections chosen randomly and the additional scheduled inspections according to 7.5.3 together shall be at least 5% of the certified operators c. unannounced inspections shall be in addition to the scheduled inspections under 7.5.2	ISO does not specify different surveillance forms such as regular inspection, additional inspection or unannounced inspections however does not rule out that surveillance can be conducted by different mechanism
336	Communications	EU Regulation	Annex III, 4.	The operator responsible must notify any changes in the description or of the practical measures referred to in point 3 and in the initial inspection provisions foreseen in section A, B, C, D and E of the specific provisions of this Annex to the inspection body or authority in due time.	Compare with ISO 13.3
337	Inspection visits	EU Regulation	Annex III, 5, Inspection visits	5. The inspection body or authority must make a full physical inspection at least once a year, of the production/preparation units or other premises. The inspection body or authority may take samples for testing .... An inspection report must be drawn up after each visit, countersigned by the responsible person of the unit or his representative. Moreover, the inspection body or authority shall carry out random inspection visits, announced or not. The visits shall cover in particular those holdings or situations where specific risk or exchange of products from organic products with other products may exist.	compare with ISO 13.3 and 13.4 EU Regulation foresees one inspection at last once a year; in addition "random" inspection visit (announced or not) are required especially for high risk operations Both EU Reg. ss well as IAC introduce risk based inspection frequency and require that additional inspections are carried out randomly for high risk operations; IAC specifically distinguish between inspections additional to the regular inspection frequency and also foresees that in addition unannounced inspections shall be carried out (at least 5% of the certified operators);
338		NOP	Subpart E	§ 205.406 Continuation of certification (a) To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to the certifying agent: ... (b) Following the receipt of the information specified in paragraph (a) of this section, the certifying agent shall within a reasonable time arrange and conduct an on-site inspection of the certified operation pursuant to § 205.403: Except, ... (c) If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in § 205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with § 205.662. (d) If the certifying agent determines that the certified operation is complying with the Act and the regulations in this part and that any of the information specified on the certificate of organic operation has changed, the certifying agent must issue an updated certificate of organic operation pursuant to § 205.404(b).	For continuation of certification, NOP requires operators to submit annually an updated organic production or handling system plan. CB shall evaluate the information by conducting an on-side-inspection within a reasonable time. The situation that changes in the operation requests immediate verification before the operator starts labelling is not addressed by NOP
339		NOP		§ 205.403 On-site inspections. (a) On-site inspections. (1) A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. (2) (i) A certifying agent may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part. (ii) The Administrator or State organic program's governing State official may require that additional inspections be performed by the certifying agent for the purpose of determining compliance with the Act and the regulations in this part. (iii) Additional inspections may be announced or unannounced at the discretion of the certifying agent or as required by the Administrator or State organic program's governing State official	similar to IAC and additional to ISO additional inspections are part of the inspection procedure; NOP does not require the CB draft criteria for scheduling additional inspections. There is neither a requirement that unannounced inspections shall take place nor a specification regarding the number of unannounced or additional inspections.
340	Use of licensee, certificates and marks of conformity				

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341	14 Use of licensee, certificates and marks of conformity	ISO/IEC Guide 65:1996	14	14.1 The certification body shall exercise proper control over ownership, use and display of licenses, certificates and marks of conformity. 14.2 Guidance on the use of certificates and marks permitted by the certification body may be obtained from ISO/IEC Guide 23. 14.3 Incorrect references to the certification system or misleading use of licenses, certificates or marks, found in advertisements, catalogues, etc., shall be dealt with by suitable action. NOTE 5 Such actions are addressed in ISO/IEC Guide 27 and can include corrective action, withdrawal of certificate, publication of the transgression and, if necessary, other legal action.	
342	7.6 Use of licenses, Certificates and Certification Marks	IFOAM AC	7.6	7.6.1 The certification body shall exercise control over the use of its licenses, certificates and certification marks 7.6.2 A certification body may permit its mark to be applied by a non-licensed party (contracted operator or seller) on behalf of a licensee provided: a. the non-licensed party is certified by another CB that is accepted under 9.2.1 b. the licensee has a system for control of the label use that is regulated by contract and that this system is verified by the licensee's CB c. the CB of the non-licensed party agrees to control and verify label use	<i>see IAC 7.6.2; requirement allows CBs to cooperate with others; Correct use and application of CBs mark is under surveillance of an "recognized" CB there is no requirement comparable in ISO 65; it conflicts with ISO 4.2.b and 4.4.a; (requirement to "be responsible for granting, maintaining, extending, suspending or withdrawing certification</i>
343		IFOAM AC	7.6.3, 7.6.4	7.6.3 The certification body shall have documents which demonstrate its ownership or control of the certification mark, when such a mark exists. 7.6.4 The certification body shall establish requirements concerning the use of its certification mark or other reference to the certification. These criteria shall require that the operator only makes claims regarding certification which are consistent with the scope of the certification that has been granted.	7.6.4 is covered in ISO 8.1.2
344		IFOAM AC	7.6.5, 7.6.6	7.6.5 Certification bodies shall actively investigate suspected cases of fraud 7.6.6 Incorrect references to the certification system or misleading use of licenses, certificates or certification marks shall be dealt with by suitable remedial actions.	for IAC 7.6.6 see also ISO 8.1.2
345		IFOAM AC		7.6.7 The certification body shall have documented detailed procedures for responding to use of its name or certification mark or certificates by uncertified parties. Such procedures shall include all steps and include the possibility of legal action. 7.6.8 The certification body shall have documented procedures for withdrawal and cancellation of contracts, certificates and certification marks. These procedures shall require the operator to discontinue use of certifications and certification marks. 7.6.9 Certification bodies shall ensure that corrective actions related to misuse of licenses, certificates and certification marks have been effective.	IAC 7.6.7 is additional to ISO; CBs shall consider also third party misuse of marks. For IAC 7.6.8 see ISO 8.1.2 IAC 7.6.9 not addressed by ISO
346	Products suspected not to satisfy the requirements of the regulation	EU Regulation	Annex III, 9.	... Where an inspection body or authority has a substantial suspicion that an operator intends to place on the market a product not in compliance with this regulation but bearing reference to the organic production method this inspection body or authority can require that the operator may provisionally not market the product with this reference. ....	respective paragraph also provides for "provisional" withdrawal for a defined time period in order to clear up suspicion Different to IAC and ISO EU regulatory text generally refers to "products bearing reference to organic production methods". This is specific for the EU Regulation which does not refer to a specific label or certification mark.
347			NOP	Subpart D - Labels, Labeling, and Market Information § 205.300 Use of the term, "organic." ... § 205.301 Product composition. ... § 205.302 Calculating the percentage of organically produced ingredients. ... § 205.311 USDA Seal.	Seal is in the ownership of the USDA
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349	Complaints				
350	15 Complaints to suppliers	ISO/IEC Guide 65:1996		15 Complaints to suppliers The certification body shall require the supplier of certified products to a) keep a record of all complaints made known to the supplier relating to a product's compliance with requirements of the relevant standard and to make these records available to the certification body when requested; b) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification; c) document the actions taken.	<i>ISO additional requirement; requirement for operators to keep a record of complaints is not neither addressed by IAC or NOP</i>
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352	Risk reduction between CBs				
353	7.9 Risk reduction between Certification bodies	IFOAM AC	7.9	7.9.1 The certification body shall require operators to notify it of all previous and current certifications within the same scope. The certification body shall communicate with the other certification body to ascertain if there were any major issues. Alternatively the certification body shall require the operator to submit the most recent certification decision issued by the other certification body. 7.9.2 In cases of dual or multiple certification with the same certification scope, the certification body shall supply the other certification body (or bodies) with copies of transaction certificates or information regarding sales and inform them in event of de-certification. The certification body shall request the same information from the other certification body (or bodies).	not addressed by ISO and not by NOP
354	Additional requirements and Inspection regime for particular circumstances				
355	Conversion Period	IFOAM AC	6.7.1-6.7.3	6.7.1 The certification body shall verify full application of the standards for a period of no less than that stated in the IFOAM Basic Standards. This shall take place following the application for certification, except in the case of 6.7.3 6.7.2 Inspection shall occur during the conversion period to verify compliance with standards. 6.7.3 Exceptions to 6.7.1 above shall be on the basis of indisputable documented evidence that full application of the standards has occurred. This shall be verified by inspection.	not addressed by ISO
356	split production	IFOAM AC	6.7.4-6.7.5	6.7.4 When split production occurs, the certification program shall have additional requirements and inspection regimes to safeguard that the products are not be mixed or contaminated. 6.7.5 In cases of split production the certification body shall require and verify by inspection: a. that the documentation regarding the production or processing, storage and sales is well managed and makes clear distinctions between certified and non-certified products; b. that the measures taken to safeguard against the risk to the organic integrity is understood at all levels of the operation.	not addressed by ISO
357	Parallel production	IFOAM AC	6.7.6-6.7.7	6.7.6 If a farm is engaged in parallel production, the certification body shall require that in addition to the requirements for split production above: a. non organic (or conversion) crops, livestock and produce and organic crops, livestock and produce are of different varieties and are visually distinguishable. Exceptions shall only be granted on a case by case basis in accordance with the requirements in 6.7.7 b. accurate production estimates are recorded and shall be checked against sales records; c. the inspection includes visits to the non-organic fields and/or processing units. 6.7.7 In cases where an exception has been granted to the requirements in 6.7. 6a inspections shall occur more frequently than once a year and at critical times. This shall normally include inspections at the time of harvest or during processing.	not addressed by ISO
358		Codex Guidelines	Annex 3	12. Where an operator runs several production units in the same area (parallel cropping) ... , crops not covered by section 1 should also be subject to the inspection arrangements ... ... indistinguishable varieties... should not be produced at these units - if derogations are allowed by the competent authority, the authority must specify ...	special measures are taken to address parallel production circumstances
359	Genetically engineered Products	IFOAM AC	6.7.8-6.7.9	6.7.8 Based on risk assessment the certification body shall implement a system to inspect and verify that genetically engineered organisms and their products or derivatives are not used in certified organic production and or/processing as required by the IFOAM Basic Standards. 6.7.9 For genetically engineered (GE) products use and contamination risk areas, the certification body shall adopt one or more of the following measures: a. review of supplier's statements verifying that the product is not genetically engineered; b. and/or analytical testing to defined limits; c. and/or documentation and evaluation of suppliers' GE control systems; d. and/or other measure(s) determined by the certification body to be more appropriate than a. through c., and as defined in the certification body's policies and procedures, consistent with this criterion.	not addressed by ISO
360					
361		NOP			particular circumstances are not adressed in NOP

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362	Inspection and certification for specific circumstances or scope				
363	Certification of wild products	IFOAM AC	8.1	8.1.1 If the certification body includes wild product within its certification scope, they it shall have documented requirements and an inspection regime that at least requires that: a. the operator issues instructions to the collectors and any local agents (middlemen), that at least defines the area of collection and informs them about the standards and other requirements for certification; b. the operator has records of all collectors, and the quantities bought from each collector; c. any middlemen shall be under contract to the operator; d. the area of production be properly identified on appropriate maps, and shall be large and distinct enough to reduce the risk of commingling with non certified production.	not addressed by ISO
364		IFOAM AC		8.1.2 The inspection regime shall at least include: a. document check b. interviews with the collectors, or a representative sample; c. visit to an appropriate proportion of the certified area; d. visits to and interviews with an appropriate proportion of middlemen; e. gathering of relevant information about the area of collection from interviews of landowners and other parties (environment agencies, NGOs etc.).	not addressed by ISO
365	approval or certification of inputs: approval systems for brand name inputs	IFOAM AC	8.2.1-8.2.3	8.2.1 Where a certification body issues lists or in any other way approves brand name products without formal certification it shall document at least the following measures: a. the application procedure, including the necessary documents to be submitted by the applicant; b. the procedure to be followed in evaluating the products compliance with the certification body's standards; c. the decision making authority; d. the length of time for which approval is granted and the requirements for the manufacturer to report changes in composition or other relevant factors; e. a clear statement of the nature and guarantee of the approval which shall appear in the listing. 8.2.2 The certification body may receive payment for its work in assessment but shall not receive any non-work related payments such as advertising endorsement payments. 8.2.3 Approval systems shall not allow for any indication of the approval on the product itself.	not addressed by ISO
366	Certification of Brand Name Inputs	IFOAM AC	8.2.4-8.2.5	8.2.4 Where a certification body issues certificates or allows the use of its certification mark on input products, in addition to the measures in 8.2.1 above , the certification body shall document the inspection and certification procedures. This shall clearly indicate: a. the inspection frequency which may be less than annual but no less than once every 3 years; b. the requirements other than the composition of the product that will be checked during inspection and evaluated in making the certification decision. 8.2.5 In cases where the product is not a certified agricultural organic product, the certification mark may only be used when it is accompanied by explanatory language that clarifies the nature of the certification/approval.	not addressed by ISO
367	Group Certification	IFOAM AC	8.3.1-8.3.18	Group certification	not addressed by ISO; neither addressed in EU regulation nor in NOP; although practically accepted for small scale farmers certification; see also EU Guidance document for the evaluation of the equivalency of organic producer group certification schemes applied in developing countries
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369	Acceptance of Prior certification	IFOAM AC			
370	General Requirements for all Methods of Acceptance	IFOAM AC	9.1	9.1.1 The certification body shall take full responsibility for recognizing the certification as equivalent to its own. 9.1.2 Acceptance of prior certification on the basis of the criteria in 9.2 and 9.3 shall only be for acceptance of product for use by the certification body's own operators and shall not confer certification status to the operator supplying the product. Acceptance of prior certification of operators seeking certification status shall only be granted on the basis of the criteria in 9.4. 9.1.3 The procedures and responsibility for granting recognition shall be clearly documented	Compare with ISO 4.4 a) and b) and note 2 and 3; The concept of acceptance of prior certification (in the chain of custody) is not referenced by ISO; acceptance of prior certification is referenced within ISO only in the context of Subcontracting (see ISO 4.4)

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371	Acceptance of Product based on Recognition of a Certification Programme	IFOAM AC	9.2	9.2.1 The certification body shall maintain a formal register of recognized certification bodies and the recognized programmes they operate. The register shall be subject to periodic review and updated when necessary and shall be available on request. 9.2.2 Inclusion in the register shall only be on the basis of at least one of the following: a. IFOAM accreditation; b. ISO 65 accreditation with an organic certification scope carried out by an accreditation body that participates in a peer review system. The certification body shall verify equivalency of standards and additional aspects of these criteria which are not covered in ISO 65. Certification bodies shall obtain and assess the protocol for acceptance of prior certification practiced by the recognized certification body.	not addressed by ISO
372		IAC text continuation		c. an assessment of equivalency to IFOAM Norms based on a recent and adequate evaluation visit and report conducted either by the certification body granting acceptance or by an appropriate third party. The assessment shall include the equivalency of policies and procedures, relevant standards and the performance of the other certification body. The assessment and decision to include a certification body on the register shall be documented d. An equivalent accreditation. Where such accreditation does not include assessment of compliance with the IFOAM Basic Standards, the certification body shall conduct a standards equivalency assessment An accreditation can be considered equivalent by either - IFOAM has determined that another accreditation is equivalent to IFOAM Accreditation. - The body conducting IFOAM accreditation has determined that another accreditation is equivalent to IFOAM Accreditation.	not addressed by ISO
373	Acceptance of Product based on Document Review	IFOAM AC	9.3	9.3.1 In the absence of a equivalency agreement or contract of recognition, the certification body shall only accept previous certification on a case by case review of the product in question. 9.3.2 The basis of the acceptance shall be an assessment of the information contained in the last inspection report, last certification decision and other relevant documents against the standards and certification requirements of the accepting certification body. Acceptance may only be granted if steps have been taken with the other responsible certification body to ensure that the information is accurate, complete and up to date and that no subsequent non-conformities have occurred.	not addressed by ISO
374		IAC text continuation		9.3.3 Ingredients that constitute less than 10% of the total weight of the product may be accepted on the basis of being certified by a certification body that has been approved by its government or has been accredited by a national accreditation body for the scope of organic certification. The total of all ingredients accepted on this basis shall not exceed 20% of the total weight of the product. 9.3.4 The procedures and responsibility for assessment and decision making shall be documented and follow the normal certification procedure. 9.3.5 Acceptance of such products shall be for a defined period.	not addressed by ISO
375	Acceptance of Applicants Currently certified by another Certification Body	IFOAM AC	9.4	9.4.1 Certification of an operator may be transferred from another certification body provided both of the following requirements are met: a the other certification body is currently IFOAM accredited under the register indicated in 9.2.2 b the operator is certified by the other certification body up to the point of transfer. 9.4.2 An operation that meets the conditions in 9.4.1 or 9.4.2 may be certified without prior inspection, provided that an inspection according to the certification body's own standards takes place within 12 months after transfer of certification. 9.4.4 Where the requirements of 9.4.1 are not met, acceptance of the operator's current or prior certification shall be limited to the exemption from conversion requirements. Exemption shall only be granted following assessment of relevant historical records, including a recent inspection report, obtained from the other certification body.	not addressed by ISO
376	Certification Partnership	IFOAM AC	9.5	9.5.1 Joint ventures, partnerships and similar forms of cooperation with other certification bodies shall comply with the relevant criteria for acceptance of product (9.1 to 9.4) and/or for subcontracting (1.4.12 to 1.4.15). 9.5.2 The certification body shall take full responsibility for any work done on their behalf by the partner. 9.5.3 The certification decision shall not be "subcontracted" to the partner. 9.5.4 The arrangement between the certification bodies shall be documented.	not addressed by ISO

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377	Packaging or transport of products to other production/preparation units or premises	EU Regulation	Annex III, 7.	specific requirements operators shall fulfill in case of packaging and transport of products to other production/preparation units or premises .....	respective requirements shall be fulfilled by operators and will be evaluated by the responsible inspection bodies. Neither ISO nor IAC specify similar requirements; IAC generally addresses surveillance of chain of custody (see IAC 2.3.3) however does not specify how operators shall ensure product identity during transport and packaging.
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