

PROCESS OF
DOCUMENTARY REVIEW OF INPUTS
SUITABLE FOR ORGANIC FARMING

ECOCERT SA



PREAMBLE

For more than 20 years, Ecocert has been involved in the control and certification of organic farming products. With this experience, Ecocert offers you the **Documentary review of inputs suitable for organic farming**.

This service is a private program managed by Ecocert SA, provided in France and abroad.

It relies on a voluntary approach from the input manufacturers or distributors, to whom it brings:

- ✦ the confirmation by an independent body of an input's compliance with the requirements of a certification program in organic farming,
- ✦ the possibility of valuing this conformity with the end user by referencing the product on www.inputs.bio (Ecocert site dedicated to inputs).

This contractual document describes the key steps of the Inputs Documentary Review process and allows interested companies to become aware of the requirements to fulfil.

It does not replace the Regulation in force in any way.

The terms used in this document are defined in Appendix I.



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I. THE PROVISION OF INPUTS DOCUMENTARY REVIEW: GENERAL PRESENTATION

A. Addressees

The Documentary Review service is open to all **manufacturers, suppliers and distributors of inputs** wishing to check the conformity of their products to the various regulations covered by the scope.

Special case of distributors of already referenced input:

A distributor wishing to use the documentary review service for an **input already referenced** by Ecocert will have to follow the same process steps as for referencing a conventional input. Only the constituent elements of the file differ in this case: a certificate signed by the distributor will be required (See "Sending the Quote, contractualisation and sending the Document Review File" on page 8-9).

For the distribution of an **input not referenced** by Ecocert, the traditional process of Documentary Review of the Input will apply.

In any case, it is not for Ecocert to verify that the distributor is actually authorised, contractually or legally, to distribute the product on a given market.

B. Aim

The inputs whose conformity is confirmed following the Documentary Review are referenced on the website www.inputs.bio (Ecocert's website dedicated to inputs recognized by Ecocert as suitable for organic farming). For the details of the referencing period, please refer to the section "Closing the file / referencing" (page 11-12).

The means of communication for this service are described in Section V of this Process.

C. Scope

The compliance of inputs subject to Documentary Review can be verified by Ecocert according to the following three Regulations for organic farming:

- EC Regulations Nos 834/2007, in particular Appendices I, II, VI VII, VIII and VIII b of the 889/2008, and / or
- The US National Organic Program (NOP) regulation, particularly paragraphs §205.600, 205.601, 205.602, 205.603, 205.604 and 205.605 and/or
- The Japanese JAS Regulation, particularly Attached Table 1 and Attached Table 2 of Notification No. 1605 of the Ministry of Agriculture, Forestry and Fisheries of October 27, 2005.



D. Input Categories

The following categories of products (definitions of the different categories in Appendix I of this Process) may be subject to the Inputs Documentary Review:

Soil and Plant treatment products:

- Fertilizers and soil amendments
- Foliar fertilizers
- Growing Medium
- Mulching products
- Seed coating products with a nutritional function
- Seed treatment products with a phytosanitary function
- Plant protection products
- Adjuvants for plant protection products
- Natural substances for biostimulant use
- Products for cleaning and disinfection of buildings and installations for animal production
- Products for cleaning and disinfection of buildings and installations for plant production (including storage areas)
- Cleaning and disinfection products for food industries
- Products for the elimination of insects and other pests in livestock buildings where animals are held
- Litter treatment products
- Animal external hygiene products
- Animal feed additives (mono-ingredient only)

Other products:

- Technological additives or processing aids for human consumption
- Biofilm treatment products
- Bacterial inoculants
- Physical barriers
- Seed coating products with no fertilizing or phytosanitary function
- Compost activators

Oenological inputs for the following types of treatments:

- Acidification
- De-acidification
- Oxygenation
- Nutrients for Yeast
- Gas (argon, nitrogen)
- Bacteria
- Wood
- Centrifugation and Filtration
- Charcoal for oenological use
- Clarification or Enzyme
- Yeast cell walls



- Activator Wine process
- Gums
- Yeasts
- Sulphur
- Tartaric stabilization
- Tannins
- Other Oenological Product.

E. Exclusions

 Liquid fertilizers containing more than 3% of total nitrogen cannot be the subject of a Documentary Review of inputs according to the **NOP regulation**. Indeed, under NOP Regulation, these products are subject to onsite audits, with samples taking for analysis.

 Household waste (or inputs containing household waste), because of the special characteristics of these products and the regulatory requirements applicable to these type of products in organic farming, cannot be subject to an Inputs Documentary Review.

For the two type of product above, the **Inputs Attestation** service,
also offered by Ecocert's Inputs Service, can be provided.



II. STEP-BY-STEP GUIDE OF THE INPUTS DOCUMENTARY REVIEW PROCESS

A. Simplified presentation of the process

The service is organised according to an annual cycle.

The main steps of the Inputs Documentary Review process are as follows (and are detailed below):



B. The main steps in detail

1. Before your request

In order to provide you with the most complete information possible, Ecocert will send you the following documents:

- The presentation brochure (for a first request),
- The Documentary Review of Inputs present process (ID01 (IU)).

We will also send you the commitment form to gather specific information about your project.

2. Receipt and checking of the initial application

Upon receipt of the requested elements, Ecocert will examine your application, which allows to:

- check that all the information requested in the forms is specified,
- evaluate the feasibility of your request.



Cases where the service cannot be provided

The *Documentary Review of Inputs* cannot be carried out in the following cases:

- Conflict of interest that may affect the impartiality of our decisions;
- Project outside the scope of the service;
- Proven participation in illegal activities;
- Client presenting a major financial insecurity;
- Lack of qualified and competent staff (technical, linguistic ...) to respond to your request.



3. Formalisation of contract

a) Preparation of your quote

On the basis of your declarations, Ecocert will prepare a personalised quote, based on our estimate of the necessary working time (administrative follow-up, study cost, etc.), in accordance with the applicable Fee Schedule.

(1) Non-oenological inputs:

The criteria used to create this quote are:

- The **number of inputs** composing your project,
- The **Regulation(s)** according to which the conformity of the input will be checked,
- The potential addition of **second trademarks or distributor products** to your project,
- The possible options.

(2) Oenological inputs :

The key to creating your quote is the number of inputs that make up your project.



Oenological inputs are automatically checked
according to both EC Regulations 834/2007 and 889/2008 and NOP

b) Sending the quote, contractualisation and sending of the *Inputs Documentary Review file*

Once developed, the quote is sent to you, along with the ***General or Technical Conditions relating to the service.***

Your Inputs Documentary Review contract will take effect **upon receipt by the Inputs Service of your signed quote.**

By signing this quote, you **agree** to comply with the General or Technical Conditions applicable to the service, and the requirements defined in the Regulation.

The Inputs **Documentary Review Contract** which binds you to Ecocert consists of current versions of the following documents:

1. The General or Technical Conditions applicable to the service,
2. The present Process,
3. The quote.



The File containing all the elements necessary for the *Documentary Review* (to be established according to the precise characteristics of your project and products) is sent to you in a second step.



There is a file specifically for «classical» inputs and a file specifically for oenological inputs

This file consists of the following elements:



- **Documentary Review guide** (constitution of your file help document) (TS11 (IU))
- **Product composition declaration form** (Excel file to be filled), (F01 (IU))
- **Statements** (documents to be completed depending of your project).

Special case for distributors:

In the case of the distribution of an input **already referenced by Ecocert**, only the distributor's **commercial documents** will be required (the other elements are already known by Ecocert through the manufacturer for the already referenced product).
In addition, a **specific** statement must be completed and signed by the distributor.

4. Documentary Review

a) Carrying out the services

After receipt of a complete file (see previous page), Ecocert assesses whether the elements provided make it possible to establish the compliance of the input with the requirements of the Regulation.

Any additional element deemed necessary may be required by Ecocert to establish the compliance of the input(s) subject to the Regulation.

In case of insufficient information or documents provided, or doubts about the conformity of an input to the Regulation, Ecocert may proceed, at your expense, to on-site inspections or analysis.

b) Exclusions

In the Documentary Review of the compliance of an input by Ecocert, only the conformity of the products with the requirements of the **selected Regulation are evaluated** (RCE 834/2007 and/or



NOP and/or JAS), on the basis of the elements (category of use, composition, etc.) that you have reported.

In particular, **Ecocert does not assess the compliance of the input with requirements other than those contained in the Regulation**, such as, for example, general regulatory requirements for products and their labelling, and in particular, does not verify the legality of the application modes, use categories, functions, application quantities or general safety rules recommended by the Client for the use of the Input.

In particular, the **commercial documents** (labels, packaging, technical-commercial sheets etc.) requested when the documentary record of inputs is compiled are only the subject of a verification by Ecocert concerning **any potential references to Ecocert** and in no case regarding the legality of the information they contained, or their compliance with the communication or labelling rules of the Regulation.

It is your sole responsibility to ensure that the product submitted for the request:

- may be marketed in a particular market, and in particular with reference to the possibility of using inputs in organic farming,
- is in compliance with the general regulations applicable to the category for which it is declared to Ecocert.



5. Closing the file

a) Conclusions

Following the completion of your Documentary Review project, Ecocert will inform you of the conclusions as follows:

▪ **Case 1 – All the products composing your project comply to the Regulation(s):**

A **Letter of conclusions (L03(IU))** is sent to you by email, indicating:

- the link to your "supplier area" on www.inputs.bio,
- the end date of referencing the compliant products on this same space.

▪ **Case 2 – Some of your project comply to the Regulation(s):**

A **Letter of conclusions (L03(IU))** is sent to you by email, indicating:

- the link to your "supplier area" on www.inputs.bio,
- the end date of referencing the compliant products on this same space.
- Attached to this letter is a **Non-Compliance Notice (L02(IU))** listing the products and ingredients for which compliance with the Regulation could not be established:
 - ✓ either due to non-compliance with the corresponding Regulation
 - ✓ either because of a lack of information which makes it impossible to decide on the compliance of these products.



In the latter case, in the absence of receipt of the required information **within 3 months** of receipt of the non-compliance notice, the relevant inputs and ingredients will be considered as non-compliant for lack of information. After this period, a new study may be carried out in order to reassess the possible compliance of the input with the Regulation (the date of initial validity will be maintained).

▪ **Case 3 – No input of your project complies with the Regulation(s):**

You will receive a **Non-Compliance Notice (L02 (IU))** listing the inputs and ingredients for which compliance with the Regulation could not be established:

- ✓ either due to non-compliance with the corresponding Regulation,
- ✓ either because of a lack of information which makes it impossible to decide on the conformity of these products.



In the latter case, in the absence of receipt of the required information **within 3 months** of receipt of the non-compliance notice, the inputs and ingredients concerned will be considered as non-compliant for lack of information. After this period, a new study may be carried out in order to reassess the possible conformity of the input with the Regulation (the date of initial validity will be maintained).



b) Referencing

When sending the Letter of Conclusions, the declared compliant inputs will be referenced on the Ecocert Inputs website: www.inputs.bio.

The Regulation for which each input has been assessed compliant (RCE 834/2007 and/or NOP and/or JAS) is specified.

The products will be referenced until the expiry date stated in the **Letter of Conclusions (L03 (IU))**, i.e. **until the end of year n+1**.

At the time of the renewal of your technical file, if your inputs remain compliant, the referencing is maintained.

c) Special case: raw material of a fertilizer

Ecocert can complete the Documentary Review of a raw material used in the composition of a fertilizer **as an ingredient of the latter** (but not intended to be placed on the market as it is).

In this case, there will be no referencing of the material on Ecocert's website (listing only the trade names of finished products) but a confirmation of the compliance of the raw material will be transmitted by Ecocert.

III. RENEWAL AND TERMINATION

A. Renewal of the service

The service is repeated each year if you have not previously notified us of the termination of your contract under the conditions set out in the applicable General or Technical conditions.

On the basis of the information that you send us at the time of renewal and/or that we may collect during other investigations, and if compliance with the requirements of the service is maintained, your listing is renewed.

B. Termination of contract

You have the possibility to ask, at any time, to stop the Inputs Documentary Review service for a part or the totality of your inputs.

In the event that you wish to stop referencing all of your inputs and terminate your contract at the same time, you must do so in accordance with the terms defined in the *General or Technical Conditions*.



IV. CHANGES WHICH COULD IMPACT REFERENCING

A. Changes in the Regulation

Ecocert is under no obligation to inform the customer of any change to the Regulation and the resulting interpretation documents (new requirements or revisions of requirements).

In the event of modifications to the Regulation that may affect the compliance of the inputs subject to the Documentary Review process, Ecocert may need to request additional information relating to the products concerned.

Depending on the case, the amended provisions will apply immediately, or transitional measures may be put in place by Ecocert.

B. Modification of your project

Ecocert must be informed without delay of any change that may have consequences on the compliance with the requirements of the Documentary Review.

These changes can be, for example:

- A change of structure (property, status ...) or contact details,
- changes of the products (ingredients, proportion of ingredients, etc.), or modification of the manufacturing processes or regulatory framework applicable to the product,
- Doubts about compliance with the Regulation for products received and/or manufactured,
- A wish to stop the referencing of some products.

C. Modification of your referencing within the year

The events listed above, as well as erroneous use of a document or any erroneous reference to Ecocert (see **Part V**) or compliance with the Regulation, may, if necessary, lead to a verification of compliance of your relevant inputs, and possibly lead to suspension, reduction or removal of your referencing on www.inputs.bio.

1. Suspension of referencing

The suspension involves the interruption of referencing, from the receipt of Ecocert's decision until the end of a specified period or until compliance. The suspension may concern one or more of your products.

To end it, you will need to provide the necessary items within the time period you have been granted.



2.Reduction of referencing

The reduction implies the immediate and final termination of referencing for **some of the products** upon receipt of Ecocert's decision.

3.Removal of referencing

This implies the immediate and definitive cancellation of referencing for **all products upon receipt** of the decision Ecocert.

This decision is also accompanied by the termination of the contract with Ecocert.



V. REFERENCES TO THE PRESENT SERVICE AND TO ECOCERT

As specified in the *General or Technical Conditions* related to the service, in no case do the receipt of the *Letter of Conclusions* and referencing on www.inputs.bio give the bearer the right to refer to Ecocert, nor to make use of the Ecocert brand, in whatever form and medium (label, invoice, technical sheet, website etc.)

However, you can, at your discretion:

- indicate on your labels and sales invoices for the product(s) concerned that the input can be used in organic farming pursuant to Regulation EC 834/2007 and/or NOP Regulation, and/or JAS Regulation.
- publish on your website the link to the referencing of your product(s) on the Ecocert website (www.inputs.bio).

Furthermore, as the Contract does not have the purpose of certifying or attesting Inputs, you undertake not to make reference to Certification or use the Ecocert certification mark. You also agree not to refer to the Attestation of Inputs nor to use the Ecocert Inputs logo in any form whatsoever.

Misuse of the trademark or incorrect reference:

Misuse of the trademark or incorrect reference to the documentary review or Ecocert may lead to (i) the implementation of appropriate measures such as reduction, suspension or withdrawal of the referencing of your inputs and/or (ii) if necessary, legal action.

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Ecocert remains at your disposal if you have any further questions.



APPENDIX I : GLOSSARY

« Input »: product(s) entering the process of developing a product from organic farming, submitted by the Client during the duration of the Contract, for the verification by Ecocert of its compliance with the Regulation.

« Letter of Conclusions »: document referring to the Ecocert website by which Ecocert informs the Client of the compliance of the Inputs with the Regulation.

« Regulation »: Regulation referred to in the quotation, and against which the compliance of the Input will be reviewed by Ecocert, in accordance with the Client's request.

« Notice of Non-Compliance »: document by which Ecocert informs the Client of the Inputs not compliant with the given Regulation.

« Referencing »: Publication on the website www.inputs.bio of the Client's compliant product(s) for a specified period.

« Documentary Review »: Examination by Ecocert of the information provided by the Client and relating to the Client's submitted Input, in order to establish if necessary its conformity with the determined Regulation.

Product categories:

- **Fertilizer:** product whose main function is to provide plants with nutrients (major elements, secondary elements and trace elements).
- **Amendment:** product that improves the physical, chemical and/or biological properties of soils.
- **Foliar fertilizer:** fertilizer, either liquid or water-soluble, which is applied as a spray on the leaves of a plant.
- **Growing medium:** element in which the plant lives and draws the minerals it needs.
- **Mulching product:** product of vegetable, mineral or synthetic origin applied on the ground to limit the development of weeds.
- **Compost activator:** a substance added to compost to increase the population of micro-organisms and/or increase the ability of microorganisms to break down composted matter.
- **Seed coating product (with or without a nutritional function):** a seed treatment product consisting of placing a product on the seed to change the shape or size of the seed to facilitate seeding, and eventually bring nutrients to the plant.



- **Seed treatment product with a phytosanitary function:** product used to protect young plants against parasites naturally present in the soil or to protect against early attacks of diseases and parasites.
- **Plant protection product:** product intended to protect plants or plant products against all harmful organisms (or to prevent their action), to have an effect on the vital processes of plants, provided that it does not concern nutrients, destroy unwanted plants or parts of plants, curb or prevent the growth of undesirable plants.
- **Adjuvant for phytosanitary products:** substance that optimizes the physical properties of phytosanitary products or facilitates their application, and which has no intrinsic phytosanitary action.
- **Cleaning product for animal or plant production, including storage area:** product used to remove soiling to ensure cleanliness, hygiene, and preventive maintenance of coverings and buildings, in production premises, livestock buildings or crop storage rooms.
- **Disinfection product for animal and/or plant production, including storage area:** product for eliminating or killing microorganisms and/or inactivating undesirable viruses, in production premises, livestock or storage of crops buildings.
- **Product for the elimination of insects and other pests in livestock buildings where animals are held:** product with an insecticidal action, acaricide or to fight against other arthropods, used in livestock buildings.
- **Animal hygiene product:** product, excluding veterinary medicinal product, used on farm animals for a cleaning, disinfecting or disinfestation action.
- **Litter treatment product:** product used on materials spread on the ground to improve their sanitary condition.

