

## ADDENDUM TO CERTIFICATION AGREEMENT

This Addendum is issued as an official supplement to the existing Certification Agreement (Document No.: TCI-P04-F3/CA) and applies solely to clients certified or seeking certification under the specific scheme. This Addendum shall be read in conjunction with the main Certification Agreement and forms an integral part thereof.

### **Applicable to EU Organic Certification Clients Only**

This section applies solely to clients certified or seeking certification under the EU Organic (EUO) scheme.

Additional section for “4.0 CERTIFICATION PROCEDURE”; 4.18 and two additional clause 18.0 On-The-Spot Examination and Audits (Unannounced Audit) by The Commission & 19.0 On-The-Spot Examination and Audits (Unannounced Audit) By Trans (Certification Body)

## **4 CERTIFICATION PROCEDURE**

- 4.18 By signing the certification agreement, the client (operators or group of operators) under organic scheme, the client and TRANS shall commit themselves as the following:
- a. to give TRANS access to all parts of all production units and all premises for control purposes, as well as to the accounts and relevant supporting documents;
  - b. to provide TRANS with any information necessary for the purposes of the controls;
  - c. to submit, when requested by TRANS, the results of its own quality assurance programmes;
  - d. to inform buyers of the products in writing and without undue delay, and to exchange relevant information with TRANS, in the event that a suspicion of non-compliance has been substantiated, that a suspicion of non-compliance cannot be eliminated, or that non-compliance that affects the integrity of the products in question has been established;
  - e. TRANS to accept the transfer of the control file in case of a change of control body or, in the case of withdrawal from organic production, the keeping of the control file for 5 years by the last control body;
  - f. to inform immediately TRANS in the event of withdrawal from organic



- production;
- g. in the event that the subcontractors of the operators or of groups of operators are subject to controls by different control bodies, to accept the exchange of information among those control bodies;
- h. to perform the activities in accordance with the organic production rules;
- i. to accept the enforcement of the corrective measures established by TRANS in the event of non-compliances.

## **18 ON-THE-SPOT EXAMINATION AND AUDITS (UNANNOUNCED AUDIT) BY THE COMMISSION**

- 18.1 The Commission shall regularly organise risk-based on-the-spot examinations and/or audits of the control bodies to evaluate the quality and effectiveness of the controls carried out by each control body. Those examinations and audits may be coordinated with the relevant accreditation body (ACCREDIA). The Commission may be accompanied by independent experts during these on-the-spot examinations and audits.
- 18.2 The Commission may request any further information, including the presentation of one or more ad-hoc on-the-spot examination reports established by independent experts that it designates.
- 18.3 On-the-spot examinations and audits may include:
  - a. a visit to the offices or premises of TRANS, their outsourced services and operators or groups of operators under their control, in the Union and in third countries;
  - b. a document review of the relevant documents describing the structure, functioning and quality management of TRANS;
  - c. a document review of staff files, including evidence of their competencies, training records, conflict of interest statements and records of evaluation and supervision of staff;
  - d. a check of operators' or groups of operators' files in order to verify the treatment of non-compliances and complaints, the minimum control frequency, the use of a risk-based approach in the conduct of inspections, the implementation of follow-up visits and visits without prior notice, the sampling policy and the exchange of information with other control bodies;
  - e. a review audit, which is the inspection of operators or groups of operators to verify compliance with the standard control and risk assessment procedures of TRANS and to verify its effectiveness, taking into account the evolution of the operators' situation from the last inspection of the control body;
  - f. a witness audit, which is the evaluation of the performance of the physical on-the-spot inspection carried out by an inspector of TRANS.



## **19 ON-THE-SPOT EXAMINATION AND AUDITS (UNANNOUNCED AUDIT) BY TRANS(CERTIFICATION BODY)**

- 19.1 TRANS shall regularly organize risk-based on-the-spot examinations and/or audits of the clients to evaluate the quality and effectiveness of the controls carried out by each client. Those examinations and audits may be coordinated with the relevant accreditation body (ACCREDIA).
- 19.2 The operator or group of operators acknowledges and agrees that as part of the certification process, TRANS shall conduct unannounced audits at any time during the certification period to verify compliance with Regulation (EU) 2018/848 and other applicable organic standards.
- 19.3 The operator or group of operators understands that unannounced audits will be conducted without prior notice. However, TRANS may, at its discretion, provide a general advance notification that the operator or group of operators may be subject to an unannounced audit within the next 4 to 5 months. This notification does not specify the exact date or time of the audit and does not exempt the operator or group of operators from maintaining full compliance at all times.
- 19.4 The operator or group of operators agrees to ensure continuous compliance with all organic certification requirements, maintain accurate records, and provide full access to premises, personnel, and documentation during any unannounced audit.
- 19.5 On-the-spot examinations and audits may include:
  - a. a visit to the offices or premises of clients, their farms, storage area, production facilities in third countries;
  - b. a document review of the relevant documents describing the structure, functioning and quality management of the clients;
  - c. a document review of production records, traceability documentation, input purchase records, and sales transactions;
  - d. a check of operators' or groups of operators' files in order to verify the treatment of non-compliances and complaints, the minimum control frequency, the use of a risk-based approach in the conduct of inspections, the implementation of follow-up visits and visits without prior notice, the sampling policy and the exchange of information with other control bodies (if applicable);
  - e. a review audit, which is the inspection of operators or groups of operators to verify compliance with the standard control and risk assessment procedures and to verify its effectiveness, taking into account the evolution of the operators' situation from the last inspection of the control body (if applicable)
  - f. a check of collection of samples for laboratory analysis to detect unauthorized substances;



- g. a discussion with key staff members to confirm compliance with organic regulations.
- 19.6 If the operator or group of operators refuses entry or obstructs an unannounced audit without a valid justification, TRANS reserves the right to suspend or withdraw certification, and relevant authorities may be informed.
- 19.7 TRANS will conduct unannounced audits in a professional manner and in accordance with confidentiality and ethical standards.