
OFDC Product Certification Procedure

1. Objective

The procedure is set up to regulate OFDC the certification activities, especially in the inspection procedure, such as the application acceptance, document evaluation, inspection schedule and implementation.

2. Applicable scope

The procedure is applicable for the management for the application acceptance, evaluation and inspection of OFDC organic and Good Agriculture Practice (GAP) certification programs.

OFDC certification scope includes: 1) CNCA-approved and CNAS-accredited *China Organic Product Standard* certification, *China Good Agricultural Practice* (China-GAP) certification; 2) IOAS-accredited certification scope, including *OFDC Organic Certification Standard* certification, *Canadian Organic Standard* Certification and the *EU Organic Equivalency* certification.

3. Responsibility

- a) Inspection Dept. is responsible for the application acceptance;
- b) Inspection Dept. is responsible for reviewing and signing certification contract;
- c) Inspection Dept. is responsible for assigning inspector;
- d) Inspection Dept. is responsible for reviewing the inspection plan set by inspector;
- e) The inspector is responsible for pre-inspection review, inspection plan, onsite inspection and write inspection report.
- f) Inspection Dept. is responsible for receiving the inspection report and transfer it to the Certification Committee.

4. Procedure

4.1 Certification Application and Acceptance

4.1.1 Applicant must submit intent of application to the Inspection Dept I, asking for the public files such as application forms, questionnaires or others. If requested, additional application information shall be provided to the applicant.

4.1.2 The applicant must return all the completed files, including application forms, questionnaires, or other necessary files such as entity qualification, environmental monitoring reports to the Inspection Dept., who must conduct pre-reviewing to the application files. The environmental monitoring reports provide by the applicant or its subcontracted producer or processor can be accepted once the reports are issued from qualified third party lab. The lab shall have legal qualification, or be a overseas lab that complies with the requirements of *ISO/IEC 17025 General Requirements for Testing and Calibration Laboratory Capabilities*. The water test report must be issued in recent one year, and the soil test report must be issued in recent three years, and ambient air quality may be based on local ambient air quality information or other evidences published by local

ecological environment administration at or above county level.

4.1.3 OFDC shall conduct a review of the information obtained to ensure that:

- a) the information about the client and the product is sufficient for the conduct of the certification process;
- b) any known difference in understanding between OFDC and the client is resolved, including agreement regarding standards or other normative documents;
- c) the scope of certification sought is defined;
- d) the means are available to perform all evaluation activities;
- e) the certification body has the competence and capability to perform the certification activity.

4.1.4 OFDC shall have a process to identify when the client's request for certification includes a type of product, or a normative document, or a certification scheme with which the certification body has no prior experience. In these cases, OFDC shall ensure it has the competence and capability for all the certification activities it is required to undertake, and shall maintain a record of the justification for the decision to undertake certification.

4.1.5 If it lacks any competence or capability for the certification activities it is required to undertake, OFDC shall decline to undertake a specific certification and explain to the client the reason for not accepting.

4.1.6 If OFDC relies on certifications it has already granted to the client, or has already granted to other clients, to omit any activities, then it shall reference the existing certification(s) in its records. If requested by the client, OFDC shall provide justification for omission of activities.

4.1.7 The Inspection Dept. shall accept the application and inform the applicant if the application form is found clear and in line with the requirements in certification standard in definite period (organic for 10 days, and GAP 14 days).

4.1.8 If the application form is found ambiguous, the Inspection Dept. shall contact the applicant and ask the applicant for supplement, amendment or explanation, and then accept the application after it is in line with the standard.

4.1.9 If the application form is distinctly found not in line with application requirements and still not compliant after communication with the applicant, the inspection and certification department shall inform the applicant of refusal of the application and provide explanation. The Inspection Department I shall explain to the applicant if the application scope is not contained in the national organic certification standard but in line with OFDC organic certification standard.

4.1.10 The acceptance of organic application must in line with 5.2 and 5.3 in CNCA-N-009:2019 Implementing Rules for the Certification of Organic Products; The acceptance of GAP application must in line with 7.1、7.2、8.1 in CNCA-N-004: 2014 Implementing Rules for GAP Certification.

4.1.11 The Inspection Department I will conduct contract reviewing, in order to evaluate the

suitability, sufficiency, and the compliance of the applicant's operation, and whether the operation is basically satisfy the related standards and laws/regulations, so as to determine whether on-site inspection can be conducted. The contract reviewer fill in the OFDC Organic Contract Reviewing Form, and sign the inspection and certification contract with the applicant. The effective period of the contract is not more than 3 years, and after the deadline of the contract, the new contract can be signed again for next 3 years.

4.2 Designation of Inspection Group

4.2.1 OFDC shall assign inspectors who have qualification in such type of inspection; inspectors assigned for inspection of group certification shall have had specific training on inspection of internal control systems or can otherwise document competency in such inspection.

4.2.2 The inspection team must sign the Inspector Declaration of Conflict of Interest prior to acceptance of the inspection to assure non-conflict of interest with the inspected operator.

4.2.3 The Inspection Dept. send the Notification for OFDC Inspection Assignment to the applicant, so as to ensure the applicant be informed of the name of inspections. However, the applicant has no right to choose or recommend inspectors. If the applicant have objection with the inspection arrangement, it can respond to the Inspection Dept. in written within 3 days.

4.2.4 If the applicant thinks the inspector to be assigned has problem of injustice, the applicant has right to reject the assignment to the inspector. For the reason of objection that raised by the applicant, only the following reasons are acceptable by OFDC:

- a) The applicant and/or operator has interest conflict of the inspector
- b) The applicant and/or operator think the inspector has ethics problem, such as prejudice, compulsion, etc.
- c) The inspector once asked for gift or other things from the applicant and/or operator.

The Inspection Dept. will investigate and confirm if the reason of objection true, if yes, the objection is acceptable, the Inspection Dept. will assign other inspector for the inspection. For inspector that is confirmed of ethics or legal problem, OFDC will handle further according to OFDC management policy on inspector.

4.2.5 The Inspection Dept. must assign qualified inspection team, sending the Certification and Inspection Authorization, and all the necessary documents for inspection and certification to the inspection team.

4.2.6 The arrangement of organic inspection must in line with 5.4 in CNCA-N-009: 2019 Implementing Rules for the Certification of Organic Products. The arrangement of GAP inspection must in line with 8.4 in CNCA-N-004: 2014 Implementation Rules for GAP Certification.

4.3 Document Reviewing

4.3.1 When the inspection team accepts the inspection, the inspector leader conduct

document reviewing and fill the “Certification Document Reviewing Record”.

4.3.2 When there is any doubt in the operator documents, the inspection team must contact with the applicant for submitting additional files for conformity (not applicable in unannounced inspection).

4.4 Inspection Plan

4.4.1 The inspection leader must work out the Inspection Plan according to the document reviewing. The inspection plan must cover the content of: certification standard, inspection scope, staff to be interviewed, site to be inspected and time schedule, etc.

4.4.2 The inspection plan shall be submitted to the Inspection Dept. for approval, and inform the applicant at least one day before the inspection.

4.4.3 If the applicant has any different opinions on the inspection plan, he may communicate with the inspector leader to coordinate the plan.

4.4.4 The Inspection Dept. must input the inspection plan to CNCA dedicated database within 5 days before the date of on-site inspection.

If local supervision office has any objection to OFDC inspection plan, they must inform OFDC at least 2 days before OFDC conduct the inspection, and OFDC must communicate with the office in time, and shall not conduct inspection until OFDC change the inspection plan which shall be agreed by the local supervision office which may accompany with OFDC inspector during the inspection for supervision.

4.4.5 The operator selected for unannounced inspection can be informed for the unannounced inspection plan 48h before the inspection, but the operator is not allowed to refuse the inspection without proper reasons.

4.4.6 The organic inspection plan must also comply with 5.4.5 in CNCA-N-009: 2019 Rules for Implementing the Certification of Organic Products.

4.5 Evaluation (Inspection) Implementation

4.5.1 Inspection team shall evaluate the management system according to relevant laws/regulations, certification standards, OFDC certification documents and the quality management system documents of the applicant/operator, verify the consistency of the production process and the documents submitted by applicant, verify the compliance of the production process with the certification standard. The inspection of group certification shall include an assessment of the risks to organic integrity within the group itself and the environment in which it functions. If necessary, inspection group shall collect product samples for testing.

4.5.2 OFDC could only admit the result of the certification related inspection conducted before this application (include the result of certification conducted by other organizations). When recognizing previous certification results and the standards used are different, the inspector shall review the production method and inputs during the whole conversion period according the standards applied for this certification. Activities under the recognizing agreement between certification bodies shall be based on related OFDC procedures.

4.5.3 The inspection team must make summary of the inspection in the exit interview. If the applicant/inspected operator has any findings in the production, management system and other related information, the inspection findings (including non-compliance issued by the inspection team) must be confirmed by the applicant/ inspected operator, and the applicant/inspected operator are approved to give explanation to any inspection findings.

4.5.4 With regard to China Organic Product/GAP Certification, inspection team shall issue non-compliance correction notice in written form. The applicant must make plans of corrective actions or implement the corrective actions in limited time (30 days for first application, and 20 days for re-certification), and submit the files of corrective actions to inspection team for reviewing.

4.5.5 If one or more non-compliance are found and applicant is willing to continue the certification process, OFDC could provide extra inspection for verification of the correction for non-compliance.

4.5.6 If applicant accept to fulfill the extra inspection, repeat the process in 4.2~4.5 to complete additional inspection.

4.5.7 If the actual situation of the applicant/ inspected operator (such as planting/breeding area, product variety/quantity, product ingredients, processing technology, etc.) is significantly changed compared with the application materials submitted in the previous period, the inspection team should communicate with the inspection department immediately. The inspection department shall carry out the review according to the requirements of 4.1.3~4.1.11 for the major changes of the applicant/ inspected operator, and at the same time obtain the understanding of the applicant, notify the inspection team including but not limited to: continuing inspection activities, expanding or reducing Inspection scope, extension or shortening of inspection days, and stop inspection evacuation from the site.

4.6 Inspection report

4.6.1 With regard to China Organic Product/GAP Certification, inspection team shall complete inspection report on the basis of verifying the compliance of non-compliance correction measurements. With regard to OFDC Organic Certification, COR and NOP Certification, inspection team only need to report the possible non-compliance of applicant/operator to OFDC, instead of issuing non-compliance correction notice to applicant/operator.

4.6.2 The inspection checklist/report (for routine, extra and post-certification supervision inspection) must be in fixed format provided by OFDC. The inspection checklist/report for routine and extra inspection are the same format, but extra inspection report can focus only on the extra operations to be inspected; the inspection report of post-certification supervision is special format, and focused on supervision points.

4.6.3 The inspection team must describe the inspection observation and findings in the inspection checklist, and write the inspection report for the conformity of applicant/operator

production/processing activity and the certification standard according to the information of on-site inspection, audit trail and sample testing (if applicable), and the conformity of the operation. The inspection checklist/report must provide enough information so as to ensure the objectivity of OFDC certification decision.

4.6.4 The inspection checklist/report must cover contents of standard, corrective actions for last year's non-compliance, information that provided by the applicant/operator, and explanation to any non-compliance, including verification that whether corrective actions have been fulfilled for previously imposed conditions, so as to ensure impartial, objective and complete judgment to any operation. The inspector must not make written conclusion that whether the operator can be certified.

4.6.5 OFDC shall provide in a timely manner the whole inspection report to the applicant, whose representative shall sign on them. It shall also allow the inspected party to analyze and explain the situation of incomplete compliance with standards or lack of transparency. The inspection report for NOP certification shall be approved by OFDC before providing to the applicant.

4.6.6 The inspection team must submit the inspection checklist/report with compliance estimation to OFDC Inspection Department, including attachment files such as OFDC Organic Certification Schedule Form, application form, Contract Reviewing Form, Inspector Assignment Notification, Certification and Inspection Authorization questionnaire, Pre-review Checklist, Inspection Plan, Subcontract of Organic Farming and Processing, OFDC Notice for Sending Organic Samples for Test, Logo Privilege User Fee Affidavit, Agreement between OFDC and the Licensees for IFOAM Seal Usage, Sign-in Form of Interview in the beginning and end of inspection, Non-GMO Affidavit, Affidavit of No Treatment of Prohibited Materials, Production Quality Affidavit, and Notification of Correction of Non-compliances, etc. The annexes for additional inspection and unannounced inspection can be selected according to situation of the inspection.

4.6.7 OFDC shall provide copy of sample testing report to applicant/operator in time.

4.6.8 The Inspection Department shall complete the receiving and registration of inspection report, record the date of receipt on the inspection report and stamp the official seal of the inspection department. The Inspection Department forwards the confirmed inspection report to the certification department.

4.7 Audit of certification information

Inspection Dept. input all required information in OFDC database and CNCA dedicated database, including current certification status of the applicant and operator, current certification scope (if applicable), and sampling & test record, so as to facilitate audit of the certification information of each operator.

5. Supporting Files

File No.	File Name
GB-GZ-01	OFDC Rules for Implementing the Certification of Organic Products
OFDC-GD4.3-01	OFDC Guideline of Sample Collection and Analysis
OFDC-GD10-03	OFDC CGG Certification Guidance
OFDC-GD10-06	OFDC Guidance for Sub-contracted Operation for Certified Operator
OFDC-GD11-01	OFDC Guidance for Notification of Non-compliance and Audit to Corrective Measures
OFDC-GD13-01	OFDC Guidance on Organic Certification Risk Management
OFDC-D8-04~12	OFDC Organic Certification Application Form (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing, and fertilizer)
OFDC-D8-13、14	OFDC Organic Contract Reviewing Form
OFDC-D8-15-(1) ~ (2)	OFDC Contract for Organic Certification
OFDC-D8-16~23	OFDC Organic Certification Questionnaire (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing, and fertilizer)
OFDC-D9-01~11	OFDC Organic Certification Document Pre-reviewing Checklist (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing, and fertilizer)
OFDC-D9-09 (1) ~ (7)	Organic Inspection Plan (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing)
OFDC-D9-10	The application for inspection cancellation
OFDC-D9-12	OFDC Notification for OFDC Inspection Assignment t
OFDC-D9-13	OFDC Organic Certification and Inspection Authorization
OFDC-D9-16	Organic Farming Production Sub-contract
OFDC-D9-17	Organic Processing Sub-contract
OFDC-D9-18	OFDC Certification Process Schedule
OFDC-D9-19~25	OFDC List of Required files for Organic Certification (Farm, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing,)
OFDC-D9-27	OFDC Notice for Sending Organic Samples for Test
OFDC-D10-05	Application Form of OFDC organic anti-fake and traceable label
OFDC-D10-06	OFDC Agreement on OFDC Organic and Conversion to organic anti-fake and traceable label usage

OFDC-D10-07	Agreement on Usage of CNAS Accreditation Logo
OFDC-D10-08	Agreement between OFDC and the Licensees for IFOAM Seal Usage
OFDC-D10-09	OFDC Sign-in Form of Interview in the beginning and end of inspection
OFDC-D10-11	Non-GMO Affidavit
OFDC-D10-14	OFDC Affidavit of Non-GMO and No Treatment of Prohibited Material
OFDC-D10-16	OFDC Inspector Declaration of Conflict of Interest
OFDC-D11-01~09 (1) and (2)	OFDC Organic Inspection Checklist/Report (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing, and fertilizer)
OFDC-D11-11~18	OFDC Production Quality Affidavit (Plant Production, Mushroom production, Wild collection, Livestock/Poultry Cultivation, Aquaculture, Processing, and fertilizer)
OFDC-D11-22、23	OFDC Notification of Correction of Non-compliances
OFDC-D13-01	OFDC post-certification inspection report
OFDC-D13-02	OFDC post-certification inspection authority
GAP-GD10-01	OFDC GAP Certification Implementation Rules
GAP-D8-05	GAP Certification Application Form (Crop, Fruits and Vegetables)
GAP-D8-13	GAP Contract Reviewing Checklist
GAP-D8-15	GAP Certification Contract
GAP-D8-16	GAP Certification Questionnaire
GAP-D9-02	GAP Notice of Inspector Assignment
GAP-D9-03	GAP Inspection Authorization
GAP-D9-04	GAP Farm Documents Reviewing Record
GAP-D9-05	GAP Inspection Plan
GAP-D9-06	GAP List of Certification Files
GAP-D10-11~15	GAP Inspection Checklist (Farm Base, Crop Base, Field Crop Mode, Fruits & Vegetables Mode and Tea Mode)
GAP-D10-22	GAP Production Quality Affidavit
GAP-D11-15	GAP Certification Inspection Report
GAP-D12-02	GAP Notification of Correction of Non-compliances