

**Revision date: 01.01.2024, ND.**

**Dear [Name of client],**

Thank you for considering ECOGLOBE as your future NOP certifying agency.

The following text is meant to inform you about the rules and regulations of the USDA National Organic Program (NOP).

This introduction covers the following topics:

1. General Requirements of the National Organic Program (NOP) Final Rule (including SOE) - Summary
2. Requirements – in brief
3. The application process
4. NOP-Inspection
5. Review and NOP-certification
6. Requirements for ongoing certification
7. Accepting Certification Decisions by other NOP-accredited Certifying Agents
8. Whom to address at ECOGLOBE

If you have any further questions, please do not hesitate to contact us.

Sincerely

[Signature]

[Date, Name and title of Signer]

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## GENERAL REQUIREMENTS OF THE NOP FINAL RULE - SUMMARY

The National Organic Program (NOP) Final Rules is being enforced since October 21<sup>st</sup>, 2002. Its regulations ensure that all products labeled and sold as “organic” in the United States of America are produced in accordance with the requirements of the NOP Final Rule.

[01.01.2024,v9] From March 19<sup>th</sup> 2024 the revised set of regulations , so called “Strengthening of Organic Enforcement” (SOE) enters into force. This historical change is based on demand of organic market in USA for traceability of chain of custody (all players with very limited exclusions will require to be certified from farm producers to importers and many others). Please familiarize with this information. If you have been certified operator before March 19, 2023, you already received information from ECOGLOBE regarding this requirement.

If you applied for NOP certification after March 19, 2023, you can find more details regarding who needs to be certified according to NOP via USDA NOP web site, to which you can easily get via ECOGLOBE LLC web site ([www.ecoglobe.com](http://www.ecoglobe.com)), as well.

Another important contribution of SOE is fraud prevention. Read more below in this document.

European organic regulations like the EC N° 834/2007, 889/2008 and 1235/2008 regulations are equivalent to NOP, but for organic products of third country origin both EU and NOP certifications are necessary in case if product is aimed at sell in both markets as organic. Private standards such as the IFOAM basic standards, Green Caucasus standard are not applicable or equivalent to the NOP certification.

Below you will find a summary of the regulations according to the NOP Final Rule. You can either order the original text of the NOP Final Rule from ECOGLOBE (complete address at the end of this brochure) or download it at <http://www.ams.usda.gov/nop/> , then click on Regulations

### 1. Operations that Have to be Certified (§205.100):

Any operation that intends to sell and label agricultural products as “organic” in the United States has to be NOP certified. This includes agricultural production, the collection of wild crops, and the processing and handling. If a product is sold and labeled as organic”, the whole chain from production to processing has to be NOP certified. For example, in the case of potato starch, all potato producers as well as the processing facility have to be NOP-certified.

#### Exemption from certification (§205.101):

[01.01.2024,v9] The following operations in [paragraphs \(a\)](#) through [\(h\)](#) of this section are exempt from certification under [subpart E of this part](#) and from submitting an organic system plan for acceptance or approval under [§ 205.201](#) but must comply with the applicable organic production and handling requirements of [subpart C of this part](#), the applicable labeling requirements of [subpart D of this part](#), and any requirements described in [paragraphs \(a\)](#) through [\(i\)](#) of this section.

- (a) A production or handling operation that sells agricultural products as “organic” but whose gross agricultural income from organic sales totals \$5,000 or less annually.**
- (b) A retail establishment that does not process organically produced agricultural products.**

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- (c) A retail establishment that processes, at the point of final sale, agricultural products certified under this part as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”
- (d) A handling operation that only handles agricultural products that contain less than 70 percent organic ingredients (as described in [§ 205.301\(d\)](#)) or that only identifies organic ingredients on the information panel.
- (e) An operation that only receives, stores, and/or prepares for shipment, but does not otherwise handle, organic agricultural products that:
  - (1) Are enclosed in sealed, tamper-evident packages or containers prior to being received or acquired by the operation; and
  - (2) Remain in the same sealed, tamper-evident packages or containers and are not otherwise handled while in the control of the operation.
- (f) An operation that only buys, sells, receives, stores, and/or prepares for shipment, but does not otherwise handle, organic agricultural products already labeled for retail sale that:
  - (1) Are enclosed in sealed, tamper-evident packages or containers that are labeled for retail sale prior to being received or acquired by the operation; and
  - (2) Remain in the same sealed, tamper-evident packages or containers that are labeled for retail sale and are not otherwise handled while in the control of the operation.
- (g) A Customs broker (per [19 CFR 111.1](#)) that only conducts customs business but does not otherwise handle organic agricultural products.
- (h) An operation that only arranges for the shipping, storing, transport, or movement of organic agricultural products but does not otherwise handle organic products.
- (i) Recordkeeping by exempt operations.
  - (1) Exempt operations described in [paragraphs \(a\)](#) and [\(c\)](#) through [\(f\)](#) of this section must make available to representatives of the Secretary, upon request, records that:
    - ⇒ Demonstrate that agricultural products identified as organic were organically produced and handled; and
    - ⇒ Verify quantities of organic agricultural products received and shipped or sold.
  - (2) All records described in this section must be maintained for no less than 3 years beyond their creation, and the operations must allow representatives of the Secretary and the applicable State organic programs' governing State official access to these records for inspection and copying during normal business hours to determine compliance with the applicable regulations set forth in this part.
  - (3) An agricultural product organically produced or processed by an exempt operation must not:
    - ⇒ (1) Display the USDA seal or any certifying agent’s seal or other identifying mark which represents the exempt operation as a certified organic operation, or
    - ⇒ (2) Be represented as a certified organic product or certified organic ingredient to any buyer.
    - ⇒ An agricultural product organically produced or processed by an exempt operation may be identified as an organic product or organic ingredient in a multi-ingredient product produced by the exempt operation. Such product or ingredient must not be identified or represented as “organic” in a product processed by others.

## 2. Organic Production - General Requirements:

The NOP Final rule covers the methods and procedures of crop production, livestock and wild plant harvesting, as well as any input of substances used in an organic production system. Any input into the system has to be in compliance the National List of Allowed Synthetic and

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Prohibited Non-Synthetic Substances, which is a part of the NOP Final Rule (§205.600-§205.607).

**Organic System Plan:** The operator has to create an Organic System Plan (OSP I) in order to assure compliance with the NOP Final Rule. This OSP has to be approved by an NOP-accredited certifying agent.

**Recordkeeping:** The operator has to record the production, harvesting and handling of products for NOP certification. These records must fully disclose all activities and transactions of the NOP-certified operation. Records have to be maintained at least 5 years.

[01.01.2024,v9, SOE] NOP clearly described definition of “Organic fraud” as deceptive representation, sale, or labeling of nonorganic agricultural products or ingredients as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”

In order to prevent organic fraud all players, including operator, producers, handlers have significant role and obligation to play. For this reason NOP has defined and requires so called “**Supply chain traceability audit** - the process of identifying and tracking the movement, sale, custody, handling, and organic status of an agricultural product along a supply chain to verify the agricultural product’s compliance with this part.”

According to 205.103(b) (2), 205.103(b)(3), Operators must “fully disclose all activities and transactions of the certified operation, in sufficient detail as to be readily understood and audited; records must span the time of purchase or acquisition, through production, to sale or transport and be traceable back to the last certified operation; “

To support their clients to meet Supply chain traceability, ECOGLOBE included in OSP templates quality and detail of expected recordkeeping that is required and will be audited by ECOGLOBE during on-site inspections (*“to fully disclose all activities and transactions of the certified operation, in sufficient detail as to be readily understood and audited; records must span the time of purchase or acquisition, through production, to sale or transport and be traceable back to the last certified operation;“*

**Prevention from commingling:** The operator has to implement measures to prevent commingling of NOP-certified crops and products with any other crops and products.

**Prevention from contamination:** The operator has to prevent any contact of prohibited substances with NOP-certified crops and products at any stage of the production process and during storing and packaging.

**2.1 Crop production:**

- The operator must be able to demonstrate that all fields intended for NOP production have had no prohibited substances applied at least 3 years preceding the first harvest of NOP crops. Also, establishing adequate buffer zones to prevent input of prohibited substances is mandatory.
- If raw animal manure is being applied, the organic material must be 120 days before harvest for crops whose edible portion has direct contact with the soil surface or soil particles and 90 days prior to harvest for crops whose edible portion does not have direct contact with the soil surface or soil particles

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- If application of composted plant and animal materials is intended, the compost production must establish an initial C:N ratio between 25:1 and 40:1; maintain a temperature between 55 - 77°C for 3 days in an in-vessel or static aerated system or 15 days in a windrow composting system. Material in windrow composting systems has to be turned at least 5 times.
- Prohibited are the application of sewage sludge and burning of crop residues.
- The use of trace elements is restricted (only certain chemical forms and certain applications).
- Synthetic substances as crop nutrient or soil amendment are only permitted if included on the National List
- Only organically grown seeds, annual seedlings and planting stock may be used, except in cases where an equivalent variety is not commercially available for seeds and planting stock and if a temporary variance has been granted by the NOP Administrator for annual seedlings.
- Plant protection and weed management: synthetic substances have to be included on the National List and natural (non-synthetic substances) do not have to be listed as prohibited on the National List..
- Lumber treated with arsenate and other prohibited substances cannot be used for new installations or replacements if there is the possibility that such lumber may come in contact with soil or livestock
- Only substances included in the National List may be used for post harvest measures.

## 2.2 Livestock:

- Bee products and fish and aquatic animals are not included in the NOP Final Rule. These products may be sold as “organic” if certified by an accredited certification agency according to EU [01.01.2024,v9] 2018/848, 834/2007 and 889/2008 or a private equivalent organic standard.
- [01.01.2024, deteted text] **[01.01.2024,v9] Transitioning Dairy animals.** Subject to the requirements of this paragraph, an operation that is not certified for organic livestock and that has never transitioned dairy animals may transition nonorganic animals to organic production only once. After the one-time transition is complete, the operation may not transition additional animals or source transitioned animals from other operations; the operation must source only animals that have been under continuous organic management from the last third of gestation. For more information read NOP 205.236.
- [01.01.2024, text deleted] Livestock that has been removed from NOP certification can not be reconverted and sold as NOP-certified product.
- NOP certified livestock has to be fed with 100 % NOP organically produced and handled feed. Synthetic substances included in §205.603 on National List and non-synthetic substances not listed as prohibited in §205.604 on National List may be used as feed additives and supplements. For more information read NOP 205.237.
- [01.01.2024,v9, text revised] The use of parasiticides is only allowed for breeder stock treatment prior to the last 1/3 of gestation and not during lactation for progeny that are to be sold, labeled, or represented as organically produced or dairy stock when used at least 90 days before milk production and sale of milk products. For Dairy animals, as allowed under [§ 205.603](#). For fiber bearing animals, as allowed under [§ 205.603 of this part](#).
- Antibiotics for any livestock are included in the Prohibited Substances List. If an animal has been treated with antibiotics, it may never be sold or labeled as “organic”.

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- Tethering is generally prohibited. Animals may only be temporarily tethered for health or safety reasons, the animal's stage of production, or to protect soil or water quality. All animals must have access to outdoors and ruminants must have access to pasture.
- More information read in NOP sections: 205.236 – 20.5.242.

### 2.3 Wild crop harvesting:

- The operator must be able to demonstrate that all wild crops are intended to be presented to market as NOP collected have to be from designated areas that had no prohibited substances applied at least 3 years preceding harvesting.
- They must also ensure that wild crops have been harvested in a manner that is not destructive to the environment and sustains the growth and (re-)production of wild crops.
- To ensure rules mentioned in previous paragraphs are implemented properly ECOGLOBE also offers its additional requirements that are integrated in its private standard and internal documents that are provided to the operators upon their application for wild crops collection.
- For guiding purposes operations may consult with NOP 5022 document. It is also made available at ECOGLOBE.

## 3. Organic Handling and Processing - General Requirements:

- The NOP Final Rule covers all methods and procedures of processing and packaging, as well as any input of substances applied in the processing system. Any input into the system has to be in accordance with the National List of Allowed Synthetic and Prohibited Non-Synthetic Substances.
- Organic System Plan: The operator has to create an Organic System Plan (OSP II) in order to assure compliance with the NOP Final Rule. This OSP has to be approved by an NOP-accredited certifying agent.
- Recordkeeping: The operator has to record the processing, handling and storage of all products for NOP certification. These records must fully disclose all activities and transactions of the NOP-certified operation. Records have to be maintained at least 5 years.
- Prevention from commingling: The operator has to implement measures to prevent commingling of NOP-certified products with any other products.
- Prevention from contamination: The operator has to prevent any contact of prohibited substances with NOP-certified products at any stage of the processing, handling, storing and packaging activities.

### 3.1 Processing:

- All ingredients for processing and processing aides have to be listed in the relating records. Please note: Please consult the National List or ECOGLOBE for a current list of processing aids and ingredients that are allowed according to EU 834/2007, 889/2008 but not according to the NOP Final Rule.
- All products and ingredients used for products to be certified and labeled under NOP labeling regulations have to be produced and handled without the use of excluded methods and materials such as ionizing radiation, GMOs, and sewage sludge (§205.105).

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### 3.2 Labeling:

- **Products to be sold and labeled as “100 % organic”** must contain exclusively NOP-certified ingredients (with the exemption of water and salt, which are not counted). That means that all processing and handling aids and additives have to be NOP certified.
- **Products to be sold and labeled as “organic”** must contain not less than **95 % NOP-certified ingredients** and not contain sulfites, nitrates or nitrites, except for wine, which may be sold as “made with organic grapes” if sulfite is added. For the remaining 5 %, the following substances are permitted:  
Non-NOP certified agricultural substances if not commercially available in organic form, non-agricultural substances included under §205.605 and non-organically produced agricultural substances included in §205.606. Organic and conventional forms of the same ingredient must not be used in one product, for example it is not allowable use to organic and conventional milk in the production of yogurt. General rule: Look up the National List when in doubt or ask ECOGLOBE as your certifying agent!
- **Products to be sold and labeled as “made with organic....”** must contain at **least 70 % NOP-certified ingredients** (by weight or fluid volume). Organic and conventional forms of the same ingredient must not be used in one product (see above). For the remaining 30 % of ingredients or substances see §205.605 and §205.606. General rule: Look up the National List when in doubt or ask ECOGLOBE as your certifying agent!
- **Products with less than 70 % of NOP-certified ingredients** may contain less 70 % NOP-certified ingredients and non-organic ingredients with no restrictions as to the origin. Organic and conventional forms of the same ingredient must not be used in one product.
- **Labeling of non-retail containers** disclose name and contact information of the certifying agent who has certified the final product, the certifiers’ seal, the identification of NOP-certification of the product, handling instructions to maintain the integrity of the product, the USDA seal and the production lot number of the product

### 3.3 Facilities

- The records for all production and handling facilities have to include **detailed facility maps** (including equipment).
- **Disinfecting of facilities** has to be performed only using biological and synthetic substances included in the National List. If permitted measures fail, the operator may use a synthetic substance not included in the National List. However, **the certifying agent has to agree with the substance, the application method and the measure for separating the applied substance from the products before application**. Please note: There are substances acceptable under the NOP Final Rule, which are not accepted according to EU 2092/92. Please contact ECOGLOBE as your certifying agent for a list of those substances, if need be!
- **For packaging of NOP-certified products**, the packaging materials must not be treated with any prohibited substance and only be reused after thorough cleaning.

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## 4. The Application Process

Once a client has decided to apply for NOP certification, he/she should send the application documents enclosed with this letter to the ECOGLOBE office in Yerevan, accompanied by the application fee. To ensure a proper review of the application, please make sure that all application documents listed below are complete and signed at the indicated places.

### Application Documents for **Producers:**

- Application for NOP certification
- Organic System Plan “Production and Handling” (OSP I)
- Field History List and Organic System Input List
- Farm and field maps

### Application Documents for **Processors, Handlers and Traders:**

- Application for NOP certification
- Organic System Plan “Processing, Handling, and Trading” (OSP II)
- Product Ingredient List
- Facility Maps.

The application package will be reviewed by ECOGLOBE's responsible person for NOP certification. In general, this review of the application will not last longer than 15 working days after receipt of the documents.

### **Acceptance of application:**

If the application is accepted, ECOGLOBE will mail a “Letter of Acceptance” including the cost decision determination and the “NOP Certification Contract”.

### **Tentative acceptance of application:**

ECOGLOBE may choose to tentatively accept the application in case of any deficiencies, e. g. missing application documents or non-compliant procedures described in the Organic System Plan (OSP). In this case, the client will receive the letter “Tentative Acceptance of Application”, in which all deficiencies are listed including a request for additional application documents or for further measures and procedures to be implemented in order to fulfill the requirements of the Final Rule. After receipt of the approval that the deficiencies are corrected, the application will be accepted.

### **Rejection and withdrawal of application:**

ECOGLOBE may reject the application for NOP certification in case that the applicant is obviously not able to fulfill the requirements for NOP certification. The applicant himself may withdraw the application. In the latter case, all costs for services provided up to the date of the withdrawal would be the responsibility of the applicant.

In case a prospective client applies with ECOGLOBE for an operation that has been previously rejected by another certifying agent, the application to ECOGLOBE will be handled like a completely new application according to §205.402. Therefore it is necessary to include in the application documents a notification of non-compliance from the former certification agent and a description of corrective measures implemented in order to achieve compliance (NOP §205.401 and 205.405 (e)).

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In the case of projects with multiple participants only one designated responsible person for the project (generally the processor or trader) may apply for certification. The certification of this operator includes the certification of all project participants. The designated responsible person will bear the responsibility for the annual basic fees and is the only project participant to whom a NOP certificate will be issued.

## 5. NOP On-site Inspection

After receiving the completed and signed certification contract, ECOGLOBE will organize the on-site inspection. An ECOGLOBE inspector will contact the operator directly to establish the date for the inspection. It is necessary that the responsible operator or a duly designated representative of the operator is present during the on-site inspection!

Below is a list of items to be examined during the on-site inspection:

- Each production, processing or handling unit of the operation including external facilities
- The general compliance with the NOP Final Rule
- The Organic System Plan will be compared with the actual on-site state of affairs
- All system inputs
- All documents relative to the operation and the products to be certified under NOP.

On-site inspection according to the NOP Final Rule will be performed annually for each operation. Additional on-site inspections (announced or unannounced) may be performed by ECOGLOBE in order to verify compliance of the operation with NOP regulations if ordered by the Administrator or deemed necessary by ECOGLOBE to determine compliance with the Final Rule.

## 6. Evaluation and NOP certification

ECOGLOBE's responsible person for NOP certification shall review the results of on-site-inspections.

### 6.1 Granting certification:

If the operation complies with the requirements of the NOP Final Rule, certification will be granted. In case of minor noncompliances, requirements for modification will be listed in the certification letter.

### 6.2 Denial of certification:

If major deficiencies have been detected, the operator will receive a written notification of non-compliance. After receipt of the letter of non-compliance the operator will be given the opportunity to implement corrective measures. If the corrective measures are appropriate and sufficient ensure compliance with the Final Rule, NOP certification shall be granted.

### 6.3 Mediation or appeal:

If the operator does not agree with ECOGLOBE's decision, he/she may request mediation pursuant to §205.663 directly to ECOGLOBE. If ECOGLOBE accepts mediation, the mediation process will be performed by a qualified mediator. If the request for mediation is rejected by ECOGLOBE, the operator may send a letter of appeal according to NOP Final

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Rule §205.680 to the Administrator (USDA-AMS, c/o NOP Appeals Staff, Stop 0203, Room 2095-S, 1400 Independence Avenue, SW., Washington, D.C. 20250-0203).

**The appeal has to be requested within 30 days after rejection of the request for mediation.**

**6.4 Re-application of the rejected operation:**

If an operation that had been rejected wishes to resubmit an application to another certifying agent or to ECOGLOBE, this re-application has to be handled as a completely new application according to §205.402. Additionally, the documents for the new application have to include a notification of non-compliance from the former certification agent and a description of corrective measures that will be established to achieve compliance (NOP N205.401 and 205.405 (e)).

**Please note:**

If ECOGLOBE has valid reasons to believe that an operator has made false statements or purposefully misrepresents the operation of compliance, ECOGLOBE may deny certification without prior issue of a letter of non-compliance. When NOP certification is denied or in case of withdrawal or surrender by Operator, all costs for services incurred up to the date of the rejection shall be the responsibility of the operator. In case of withdrawal or surrender by Operator before certification during document review the “Preparation and information fee” and 20 % of total annual fee calculated by ECOGLOBE for annual services will be charged from Operator or not returned to Operator.

**7. Ongoing Certification**

Once the operation is NOP certified, it has to comply with the following requirements:

- Confirm the actual Organic System Plan (OSP) on an annual basis [01.01.2024,v9] (check the date of annual update submission on your certificate under section “annual update date”)
- Provide summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year’s OSP during the previous year;
- With confirmation, indicate any implemented or intended modifications of the actual OSP (any additions or deletions to the previous year’s OSP, indented to be undertaken in the coming year)
- Inform ECOGLOBE of any changes, problems or modifications of the OSP if they occur during the period for which certification has been granted.
- An update on the correction of noncompliances previously identified by the ECOGLOBE as requiring correction for continued certification.

[01012024, deleted text]

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After receipt of the OSP and the related information, the annual on-site inspection will be performed by ECOGLOBE. If the operation is still complying with the NOP Final Rule, ECOGLOBE will issue an updated NOP-certificate.

## 8. Accepting Certification Decisions of Other NOP certifying Agents

Per NOP regulations ECOGLOBE has to accept certification decisions by other NOP accredited or accepted certifying agents.

## 9. [01.01.2024,v9] NOP Confidentiality and Public Information requirements

“Public information” as it is foreseen by NOP 205.504(b)(5) is 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;

*List of ECOGLOBE certified and decertified operators is updated in USDA NOP Organic Integrity Database (OID) and are available for any member of public. Meantime in the framework of its ISO17065 accreditation ECOGLOBE regularly updates list of its certified and decertified clients/operators on web-site. The contact information in ECOGLOBE is public via this list and any member of public has right to approach ECOGLOBE for information regarding certification status of operators as it is foreseen by NOP and other organic schemes. Effective date is public via certificate templates and OID.*

(iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years;

*ECOGLOBE is readily available for any member of public to request the results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years. The results of analyses will be provided to such member of public.*

(iv) Other business information as permitted in writing by the producer or handler;

*If approached for any other information other than public and regulated regarding certified operators, ECOGLOBE will get into contact with operator in writing (via-email) and get their permission for submission such information or, if otherwise requested by the operator, will direct member of the public to the operator for such information.*

**(v) Fees for certification** are published on web site of ECOGLOBE. The most recent actual fees are published after submission to NOP as required.

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USDA NOP official representatives will be provided with any information regarding the operator's organic certification information without prior notification to the operator. Consideration is that USDA NOP officials keep the strict confidentiality policies for information obtained from certifier, other than approved as public by the law.

ECOGLOBE to protect the integrity of organic market and to prevent the fraud will closely collaborate and communicate with other ACAs if such necessity of exchange will appear. ECOGLOBE will respond in a collaborative manner requests from other ACAs related to information available in ECOGLOBE. If necessary the confidentiality policy will be applied during such exchange

## **10. [01.01.2024,v9] Supply Chain Traceability and Organic Fraud Prevention (SOE).**

### **Anti fraud policy and tools foreseen by ECOGLOBE:**

ECOGLOBE may conduct additional audits as unannounced inspections on-site, additional inspections announced, desk checks of documentation or records to be submitted at the request of ECOGLOBE responsible staff.

ECOGLOBE is pursuing and implementing line of communication with other certification agency/-ies of a supplier/-s or seller of organic product to applicant or certified operation of ECOGLOBE. In such critical cases when information shall be disclosed under the NOR law to other certifiers, ECOGLOBE will apply its confidentiality policy to/with such certifiers. ECOGLOBE is encouraging its clients (as fraud prevention mechanism) to source to possible extent the organic products/raw material/ ingredients with the transaction certificates obtained from certifier of seller/supplier, as well as to sale or supply organic products to next buyer accompanied with the transaction certificate.

## **11. Whom to Contact at ECOGLOBE?**

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