Sabiedrība ar ierobežotu atbildību "Sertifikācijas un testēšanas centrs" Atbilstības novērtēšanas nodaļa

Developed by: I.Lāce Agreed by: Confirmed by: L. Kivlina A.Makarevičius



Ensuring product mass balance and traceability for organic farming operators

1. Purpose

Establish a unified function to ensure product traceability of organic farming operators.

2. Field of activity

The requirements of this procedure apply to certifiers conducting inspections of organic farming operators in third countries.

3. Regulations

- 3.1. Commission Regulation (EU) No 2018/848 of 30 May 2018 on organic production and labeling of organic products and repealing Council Regulation (EU) No 834/2007.
- 3.2. COMMISSION REGULATION (EU) 2021/1698 of 13 July 2021 supplementing Regulation (EU) 2018/848 of the European Parliament and of the Council on procedural requirements for the recognition of control authorities and control authorities competent to exercise control over certified organic product operators and organic product groups , as well as with organic products in third place. countries for supervision and control, as well as other actions to be carried out by these supervisory authorities and supervisory authorities.
- 3.3. Technical standard ANN-P-BL-012-EN
- 3.4. Letter and guidance on additional supervision and controls in third countries.
- 3.5. Other documents and instructions establish the necessary actions and procedures depending on the degree of risk of the operator.
- **4. Frequency of submission of the report** ANN-F-BL-080 "Report on harvesting and storage of crops" on the harvested crop
- 4.1. Frequency of submission (operator reports at least twice a year)
- 4.1.1. Within three days after harvesting winter and early spring crops;
- 4.1.2. Within three days after harvesting late spring crops;
- 4.1.3. or necessarily together with the application ANN-F-BL-077 "Application for control services", if the service for control, sampling of products is ordered before the submission of the harvest report.
- 4.2. The report is sent to the e-mail address: coi@stc.lv.
- 4.3. Reports submitted by operators on Form ANN-F-BL-080 Harvest and Storage Report are placed in the operator's Harvest File U:\ Operators' Files.
- 4.4. After receiving the submitted report, SIA "Sertifikācijas un testēšanas centrs" (hereinafter referred to as the SC) decides on the control measures to be carried out (physical control of the operator during an extraordinary or scheduled inspection or documentary control, documentary control, etc.).

5. Placement of products after harvest:

5.1. Products are placed in the warehouses of the operator - Report on harvested products in the form ANN-F-BL-080 "Report on the collection and storage of crops" according to clause 4.

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- 5.2. The operator plans to place products in other certified warehouses: 5.2.1. Not later than 5 working days before harvesting, notify the SO about: the planned date of harvesting and the planned date of placement of the crop, the type of crop, the numbers of the fields from which the crop should be placed in the warehouses specified in this application, the planned the volume of the harvest to be placed in the warehouses specified in this application the exact location of the warehouse (address, warehouse number, silo number, etc.) justification for product placement (product placement agreement, lease agreements, etc.)
- 5.2.2. **It is forbidden** to start the placement of products in the order described in paragraph 5.2.1. without an official response about permission from the CO.
- 5.2.3. After obtaining permission to place the products, the operator can start placing the specified products in the specified composition/s;
- 5.2.4. After obtaining permission to place products, the CO decides on the necessary control measures (physical control of the operator during an extraordinary or scheduled inspection or documentary inspection, documentary control, etc.).

6. Product movement:

- 6.1. The operator must submit form ANN-F-BL-077 "Request for control services" to the CO before each movement of products outside the warehouses / places of storage of products, no later than three days before the planned movement of products, accurately indicating the address, type of service provided, place of movement of products, its type, batch number, etc.
- 6.2. After receiving ANN-F-BL-077 "Application for control services", the CO decides on the type of control over the movement of products, assessing the degree of risk of the operator, the type of product, etc. The type of control can be physical control, documentary verification, etc., control can be carried out in full or selectively.
- 6.3. After making a decision on the type of inspection, the CO sends an order to perform work to the inspector and / or operator. In the case of an inspector, signed ANN-F-BL-077 "Application for control services", in the case of an operator Form ANN-F-BL-092 Report on the movement of a batch of products and the procedure for submitting documents.
- 6.4. The movement of products can only take place after the coordination and approval of the CO control procedure.

7. Product sampling and batch confirmation:

- 7.1. It is allowed to carry out only in the manufacturer's warehouses or in warehouses for which permission has been obtained from the CO in accordance with paragraph 5.2.
- 7.2. The operator must submit ANN-F-BL-077 "Request for Inspection Services" about the need for sampling no later than three business days before the scheduled sampling. To provide the service, you must provide:
- 7.2.1. harvest report ANN-F-BL-080 "Report on harvesting and storage of crops" by the operator to the producers;
 - 7.2.2. documents for the purchase of products in the case of operators a trader;

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7.2.3. documents for the acquisition and processing of products (documents of internal traceability) in the case of operators - processing, processing;

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- 7.3. Upon receipt of the application for sampling, the CO organizes and executes the sampling procedure in accordance with procedures ANN-P-BL-006 or ANN-P-BL-025.
- 7.4. In the event that the operator needs to move the product before receiving the results of the laboratory tests and before confirming the lot in accordance with the requirements of organic agriculture, the operator must provide the CO with a letter of guarantee that he will not file a claim against the CO in case the results of the laboratory tests are inappropriate.
- 8. Application ANN-F-BL-077 "Application for control services" must be submitted separately for the desired services for a particular batch, especially for sampling and product movement, product transshipment.
- 9. CO reserves the right to decide on non-compliance of products (batch, volume, type, etc.) with the requirements of organic agriculture, issue a Certificate of Inspection (COI) and / or Internal Certificate (TC), if the requirements of paragraphs 4 are violated, 5, 6, 7 of this procedure.
- 10. The annual on-site physical inspection referred to in Article 9 (4) Reg. 2021/1698 shall include a traceability check of operators or groups of operators and a mass balance check by checking records and any other relevant elements deemed necessary by the controlling authority. or control body. For traceability and mass balance checks, the selection of products, product groups and the period to be tested is based on the risk assessment carried out by the CO.
- 11. Traceability checks cover at least the following elements supported by appropriate documentation, including warehouse and financial records raceability check covers at least three lots) (:
 - 11.1the name and address of the supplier of the product and, if different, the owner, seller or exporter of the product;
 - 11.2 the name and address of the recipient of the products and, if different, the buyer or importer;
 - 11.3supplier certificate in accordance with the implementing act adopted in accordance with Article 45(4) of Regulation (EU) 2018/848.
 - 11.4. Operators shall ensure that the transport of organic products and products in transition to other operators or other installations, including wholesalers and retailers, is carried out only in appropriate packaging, in containers or in vehicles closed in such a way that their contents cannot be replaced without manipulation or damage to the seal, and provided with a label indicating, without prejudice to other information required by European Union law (Article 2.1 of Annex III to Regulation (EU) 2018/848) the details:
 - 11.4.1. the name and address of the operator and, if different, the owner or seller of the product;

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- 11.4.2. product name or description of the compound feed, accompanied by a reference to organic production;
- 11.4.3. the name or code number of the command or control body to which the operator is subject; as well as

where it is necessary to designate the lot in accordance with a labeling system approved at national level or agreed with the control or control authority, which allows the lot to be linked to records as referred to in Article 34(5) of this Regulation.

The information specified in paragraphs 11.4.1. — 11.4.4 may also be presented in an accompanying document if such a document can be unambiguously associated with the product packaging, container or vehicle for its carriage. Such accompanying document must contain information about the supplier or carrier.

- 11.5. appropriate batch identification;
- 11.6. in the case of processors, the necessary information to ensure internal traceability and guarantee the organic status of the ingredients.
- 12. The mass balance check should cover the following elements, supported by appropriate documentation, including warehouse and financial records, where applicable (Mass balance check for at least for three months period):
- 12.1. the nature and quantity of the products supplied to the division and, if necessary, the materials purchased, the use of such materials and, if necessary, the composition of the products;
- 12.2. the type and quantity of products stored on the premises, including during on-site inspection (for all products, whether they are sold as organic or not, and whether they have been exported or not);
- 12.3. the nature and quantity of products that have left the division or warehouse of the recipient of the operator or group of operators;
- 12.4. if operators or a group of operators buy(s) product(s) without storing or physically handling the product(s), the nature and quantity of products bought and sold;
- 12.5. output of products received and/or harvested in the previous year;
- 12.6. planned or actual output of products received and / or harvested in the current year;
- 12.7. Number of livestock and/or weight of livestock in the current and previous year;
- 12.8. loss of products, increase or decrease in its quantity at any stage of production, preparation and sale;
- 12.9. the total production volume of the operator of organic and inorganic products.