

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 1 of 7

Procedure for granting, for maintaining, for extending or reducing the scope

All Operators who wish to take part in LACON inspection process are treated in a non-discriminatory manner and services are available to all operators, independent of their size or membership in an organization, an association or a group. The participation of operators are not impeded or inhibited by LACON charging unreasonable fees or imposing other undue conditions. LACON evaluates the operator based on the Regulation (EU) 2018/848 developed by the regulator.

LACON adopts a two-stage process:

- Inspector/auditor visits the site/field
- Reports to the Certification committee, where the decision is made on the findings. The whole certification steps are given detailed in Annex B.

The criteria against which the products of a producer are evaluated are those outlined in regulations (EU) 2018/848 in the category scope:

Category D - Processed agricultural products, including aquaculture products, for use as food (Refer Art 2 Scope, Clause 1-2018/848

Category E – Organic Feed Processing/ Handling Refer Art 2 Scope, Clause 1(c)-2018/848

Category G – Annex I of the Eu regulation 2018/848, other products referred to in article 2(1)

New/ Existing Operator/ Application Form Handling Procedure

A procedure followed in application handling for new registration of an operation according to the Regulation (EU) 2018/848. The first step for getting LACON certification is that the operator (the person responsible for processing/ handling unit to be certified) contacts the LACON office. LACON sends a detailed application package including the following documents:

- A brief on this procedure leading to certification
- Application form (for Organic Processing/ Handling) as applicable. (To apply for certification the operator needs to complete the application form and return it to the LACON office.)
- Brochure
- Link to the Regulation (EU) 2018/848.
- The links to the Tariff sheet
- Any additional information requested will be provided
- The operator is informed about the requirements that will be checked during inspection for making the certification decision.
- Applicants need to submit a complete list of ingredients of the product and a list of processes involved in the manufacturing process.
- They need to grant access to LACON inspectors to the processing unit and the book keeping related to the product.
- Permit and make arrangements for on-site inspections with complete access to the production or handling operation, including non-certified production and handling areas, structures, and offices and personnel by the certifying agent.
- LACON guarantees full confidentiality in handling of all products and Operator information

In case of existing operators/ renewal, only the application package, sanction catalogue and information on the changes in the Regulation, or procedure including fees are communicated. The normal time for receipt of a completed application form from the prospective operator is about one month from the date of dispatch of blank application form and other material. In the intervening period, clarifications, if any, are offered.

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 2 of 7

Scrutiny and Review

The administrative staff after receiving the filled in application form and OSP, scrutinizes the form for the completeness of the information and the signature of the prospective operator/ his representative. In case of requirement of information from the prospective operator to complete the application form, the administrative staff contacts the prospective operator and gets the application form completed.

The Evaluator or an inspector assigned by the certification manager reviews the application and OSP for feasibility of undertaking the Inspection and Certification. The review report is sent to the operator thereby facilitating the operator to self-assess whether the operation activities can be modified to meet the Regulation requirements. The Operator fills out and signs an application form and OSP. The OSP & application form includes information that describes the project. An authorized LACON auditor validates this operation description during the on-site inspection whereby all deviations and non-conformities with respect to the requirements of the Regulation (EU) 2018/848 are identified.

LACON ensures that the application and OSP is complete and contains info on the:

- Product, process or service to be certified;
- A defined scope of certification;
- the means for the LACON to conduct the evaluation, and the means (competence and capacity) to conduct the inspection and certification.

When LACON is accepting new applicant, the following criteria's are verified:

- The inspector /evaluator assigned is having the competency detailed in Annex G
- the object of certification is in compliance with the scheme requirements
- the specifications for certification is in compliance with the scheme requirements
- the applicable scheme and relevant scope
- Intended/end use of the product to be certified is in compliance with the scheme requirements
- Whether the operator has any past history of sanctions or actions by any other certification bodies. LACON shall not certify operators or groups of operators that have been withdrawn by their previous control authority or control body in the last 2 years, unless the recognition of the previous control authority or control body has been withdrawn by the Commission in accordance with Article 46(2a) of Regulation (EU) 2018/848 for the specific third country and category of products.

LACON maintain evaluation report based on the application review. If LACON lacks any competence for the work it declines the application and immediately informs the operator in writing. If the work is based on previous certifications, any changes in approach from the previous CB are verified

Quotation/Estimate

a) The administrative staff prepares a quotation based on the tariff and the following---

- Type of production systems- processing/ Handling units (Food/Feed)
- Location of unit
- Mode and time of travel
- Cost for travel, lodging and boarding.

b) The administrative staffs forward the quotation to the prospective operator along with the Certification Contract.

c) LACON receives the signed contract from the prospective operator along with the full payment as per the estimate by financial transactions to LACON.

d)The administrative staffs review the transaction against the estimate for correctness of the amount and records.

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 3 of 7

- e) The administrative staffs send the copy of the signed contract to the operator.
- f) The administrative staffs subsequently store the application form in an exclusive file opened for the operator.
- g) Decisions pertaining to certification, appeals etc. are recorded. All the documents are kept in the office for at least 5 years.

Upon receipt of confirmation of the estimate and receipt of the signed contract regarding certification, LACON management assigns a suitable inspector to conduct the inspection. The inspectors assigned for inspection are as per the required or defined qualification/training/experience for the category inspected. Conflict of interest is checked before assigning inspections. Inspectors are assigned by the LACON and are not selected or requested by the operator.

The operator informs the LACON of any change in the operation and updated description of operation and other relevant documents is submitted to the LACON for approval. If required the LACON undertakes inspection. If the changes in operation are not in line with the Regulation the LACON immediately notifies the operator to suspend operations.

Inspection Procedure

This Regulation inspection program serves as a description of the inspection procedure according to:

- EU 2018/848 - Organic Production and Labelling of Organic Products.
- ISO 17065- Conformity assessment — Requirements for bodies certifying products, processes and services
- ISO 17000- Conformity assessment — Vocabulary and general principles
- ISO 17020- Conformity assessment — Requirements for the operation of various types of bodies performing inspection
- ISO 17021- Conformity assessment — Requirements for bodies providing audit and certification of management systems

This Regulation inspection scheme will only be applied after approval by the accreditation body. If practice proves that changes in the Regulation inspection program or in the inspection forms used would be useful, a corresponding change will be made.

The frequency of the inspection has been determined by, among others;

- Capacity of processing/ handling unit.
- Location, Type and complexity of the activities or operations of operators/ subcontractors
- Whether the holding includes non-organic or in-conversion production units;
- The type, quantity and value of products;
- The risk of commingling of products or contamination with non-authorized products or substances;
- The critical points for non-compliance at every stage of production, preparation and distribution
- Whether operators or groups of operators have changed their certifying control authority or control body;
- Outcome of previous inspections and the operator’s record of compliance.
- Any complaints received by the Official Authority

The timing of the inspections is not the same so that the timing will not become predictable. The Sub-contracted parties of the operator are inspected at least once every year. Annual inspections are carried out to confirm an operation’s certified status. Additional inspections throughout the year, either announced or unannounced, may be conducted, based on risk.

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 4 of 7

On-site Verification of the Unit

The LACON auditor verifies the information in the application form during the inspection of the premises (buildings, warehouses, stalls, other areas belonging to the operation) and checks the documentation.

The Inspector verifies the following points;

- name and address of project administration, of each processor(food/feed) / exporter and all other operational units / facilities at the disposal of the project and in which processing is done or which is involved in marketing/ export/import into EU, each with the name of the person responsible
- Evidence that facilities in other regions or other countries are under regular submission to certification procedure, either through LACON or another certification body accredited for project inspections.
- Organization chart with persons responsible and their functions
- Last use of products not corresponding to the annex given in the valid version of the Regulation (EU) 2018/848.
- Possible parallel production of organic / non organic products
- Description of processing (food or feed) facilities
- Plan of all buildings and storage facilities in the operation connected with the processing of products falling under the Regulation (EU) 2018/848
- Confirmation of complete separation of products of organic from other products being processed
- Procedures concerning cleaning and disinfesting of rooms and installations
- Book keeping concerning processing (food/feed)/import/export
- Book keeping concerning receipt of agricultural products, semi-fabricated goods and finished goods stating kind, origin, conformity, quantity, commercial designation and receipt of goods documentation; bookkeeping concerning stock, processing and sales
- List of suppliers, list of commercial customers
- List of products, type of labelling
- Previous scope certificates
- Arrangement for the resolution of complaints against the certified operation or produce.
- Operator shall maintain a complaint register and should update the actions taken on the Complaints received.

The inspector makes reports of the on-site inspection(s) using the appropriate LACON forms and submits these reports, any supportive documentation and any non-conformity with corrective actions to LACON. The Operator is provided with a copy of the report. The auditor finalizes the product list for certification and either a hard copy or soft copy is submitted to LACON for respective year.

The lead inspector for large projects summarizing all the findings of the on-site reports makes a written report during the exit meeting. A copy of this report is given/ sent to the Operator. A copy of inspection report is submitted to the LACON by the inspector after inspection.

Inspection report is comprehensive, covering all relevant aspects of the Processing / Handling in line to the Regulation (EU) 2018/848 and adequately validates the information provided. The inspection and reporting follows a definite protocol which renders the inspections objective and non-discriminatory. The design of the report is such with more descriptive in areas where compliance might be partial, Regulations might not be clear etc. The inspection report includes (but not restricted to)

- Date and time of inspection

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 5 of 7

- Persons interviewed
- Products requested for certification
- Facilities visited
- Documents reviewed
- Inspector's observations
- Evaluation of compliance to Regulation, and certification requirements
- The inspection report lists non-conformity

The report notifies if further evaluation or testing is required.

During the inspection the procedures implemented in order to ensure the integrity of organic products and prevent commingling or contamination with non-authorized substances will be verified: (Reference: EU 2021/1698, Article 9(2))

- The operator has a clear procedure for all stages of organic product processing, storage and handling.
- Segregation of Organic and Non-Organic Products: Keep organic and non-organic products physically separated at all times. This includes transportation, storage, processing, and packaging.
- Designated Storage Areas: Use designated storage areas for organic products to prevent contact with non-organic products. These areas should be clearly marked and maintained to prevent contamination.
- Cleaning and Sanitization: The method implemented to regularly clean all equipment, containers, and surfaces that come into contact with organic products. Use organic-compatible cleaning agents to avoid introducing non-authorized substances.
- Establish criteria for selecting suppliers of raw materials and ingredients. Ensure that suppliers comply with organic regulations and provide documentation verifying the organic status of their products
- Incoming Goods Inspection: Inspect all incoming goods to verify their organic status and check for any signs of contamination or commingling with non-organic products. Reject any shipments that do not meet organic standards.

Review and Certification

- For the first certification
- For maintaining certification (following annual inspection)

The auditor assigned to conduct the inspection submits all reports, including the evaluation report, to the Department Management. The LACON department management conducts the review or delegates another LACON auditor, authorized by the director to conduct reviews in this field, to do so. No person or institution outside of LACON is delegated for conducting the review. Decisions from responsible authorities, under which LACON is authorized to conduct administrative activities and whose directives LACON must follow, are to be taken into consideration if they affect the certification, as are sentences resulting from court cases affecting the certification.

The following are verified in the review:

- Correct participation in the inspection process (data bank consultation, status)
- Categories to be certified (data bank consultation, application form)
- Documents submitted complete (description of operation with commitments where required, validation, inspection report, evaluation, annex)
- Evaluation complete including report of deficiencies
- Signing of evaluation and description of operation

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM	Regulation (EU) 2018/848	Rev. No. 00	Page 6 of 7

- Adequate specification of corrective actions (corresponding to deficiencies revealed)
- Requirements resulting from previous inspections fulfilled (notes in inspection forms, data bank consultation)

Further related information for making a decision on the certification could be:

- laboratory results
- results of previous inspections
- information from official authorities
- information from official food surveillance bodies
- information from economic parties or associations
- as well as consulting the auditor in the case of unclear points or in the case that the review result deviates from that of the evaluation by the auditor.

After the allotment of review, the certification has to be completed within 45 days.

The department management or the delegated auditor makes a decision on the certification or non-certification based on the evaluation report and the relevant information named above. If the department management has carried out the inspection or the evaluation and the auditor assigned for the review comes to a deviating result, the final decision is made by a committee authorized for reviews and is a majority decision. The decision on certification is finalized with the signature of the department management or his representative on the certificate. The decision making authority is not delegated to outside person or body.

The decision on certification is recorded in the LACON Control documents. Sanctions and measures with deadlines are also recorded. If the review results in sanctions, measures and actions or deadlines differ from those in the evaluation that was already given to the operation following the on-site inspection; these are conveyed to the operator. In the field of organic agriculture, all measures, actions and sanctions are conveyed to the operator after the review has been completed. If the review result differs from that of the evaluation, a report is made and filed. If deadlines must be awaited that affects the certification, the decision on the certification remains open until the measures have been fulfilled or the deadline has expired.

Corrective actions:

A certification may include requirements for the correction of Critical/ Major/ Minor non-conformities that must be implemented within a specified time period. The operator is notified on the corrective action complying with the Regulation Requirements and the specified time period in which these are to be completed in the language of the operator.

If the corrective action is not inline, the Operator is further notified for alternative corrective action.

Certification Committee Decisions

The decision on certification is finalized by the members of the certification committee with the signature of members. The responsibility is with the department management. The decision on certification is made by the committee members based on the inspection findings, closure of non-conformities by the operator and review report by the reviewer. The certificate start date will be the date after the certification decision and this is a collective decision by the members of the committee.

Issuing Certificates

In the case of a positive decision, LACON issue a certificate in the approved format that specifies the content with Annex VI, Regulation (EU) 2018/848 from the electronic Trade Control and Expert System (TRACES).

The department management signs the certificate. The certificate can be considered a product related Operator certificate. It does not confirm the compliance of a specific product or a batch. It is confirmed that, based on the last inspection and the procedures and products presented at that time, the Operator operates complies with the Organic Regulation (EU) 2018/848.

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024

Lacon-IN	Procedure for Granting, maintaining or extending or reducing scope, Suspension or withdrawing or refusing Certification	OM/ Annex J	
Annex .OM		Rev. No. 00	Page 7 of 7
Regulation (EU) 2018/848			

Continuation of certification

After the inspection, the certified operation is inspected annually. The Organic System Plan must be up-dated annually by the operator to include all changes taking place within the past year. An authorized LACON reviewer or the inspector conducting the inspection evaluates the System Plan using the appropriate LACON form to record results of findings and to record measures to be taken. On-site inspections and a review of the inspection reports is conducted as described in points above

Denial of certificate.

If the review conducted concludes that the operation seeking certification is not in compliance with the Regulation and cannot be expected to attain compliance within a reasonable time period by implementing corrective actions, the management informs the operator of its decision and then explains the reasons.

Suspension and withdrawal - termination by LACON

Suspension of certification

In the case of violations with sanction level EV (removal of references to certified quality, see above), product related confirmations for certain batches are suspended, for which the requirements of the regulation applied are no longer met. As soon as it is proven, that the conditions for certification in this category are again met, the Operator may again make references to certification and the suspension is revoked. If the suspension of certification is related to specific batches, LACON does not make any further notification of the cancellation, as this is evident in the withdrawal notification.

If the suspension applies to batches and to a process or the entire activity of the Operator, the Operator may only make references to the certification by LACON again, following verification, after LACON has given written notice of the cancellation.

Objections or complaints may be made by the Operator and are dealt with by LACON but have no delaying influence. All decisions hereto are the responsibility of the department management.

Withdrawal of certification

In the case of a deliberate violation against the regulation, the certification is withdrawn and the use of all LACON certificates is prohibited. The Withdrawal status of the Operator will be also immediately informed to the official authorities.

The certification process may be terminated by LACON without respecting deadlines in the case of important reasons. In the case of non-payment of fees due and after unsuccessful legal action, LACON may terminate the contract and prohibit the use of certificates. In this case, the official authorities are informed immediately.

Objections or complaints are dealt with as by suspension of certification. The department management makes the decisions hereto.

Surveillance of abiding by suspension or withdrawal of certification

LACON verifies by on-site inspection or through documents submitted that the batches concerned are not marketed with references to certification or to fulfilment of the Regulation. According to requirements and procedures in the regulation, the authorities of other states or regions are informed so that other control bodies such as other certifying agents can be informed of the suspension and can ensure through their activities, that no misuse takes place.

Prepared:	Verified	Approved & Released:
APK 13.11.2024	AKP 14.11.2024	BI 15.11.2024