

# Biodynamic Association Certification Quality Manual

## Issue 8 May 2016



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### 1.0 Quality Policy Statement

Biodynamic Association Certification (BDA Certification) has been established for the purposes of certifying food and non-food products to Demeter and EU organic standards. BDA Certification recognises the need and importance of impartiality in the process of certifying products and processes and is committed to safeguarding the impartiality and thereby the integrity of its affairs.

The basis within which both the Demeter and organic certification programmes operate from is the regulatory requirements of BS EN ISO/IEC 17065:2012 '*Conformity assessment – Requirements for bodies certifying products, processes and services*'. The requirement for the Demeter certification programme is enhanced by the Demeter International '*Directions for the Implementation of a Certification Programme*'.

The Demeter and organic certification programmes are accessible to all applicants, regardless of size of operation, who commit themselves to Demeter and organic standards, as applicable. All applicants to and licensees of the schemes shall be treated on a non-discriminatory basis.

The Certification Board promotes practices to ensure that the organisation meets compliance with all relevant regulatory and legislative requirements, and that its aims and objectives of continuously improving the quality of service in both the Demeter and organic schemes are achieved.

The Certification Board, the Standards Committee and staff receive training in BS EN ISO/IEC 17065:2012 and the standards, policies and procedures of the certification schemes.

The Standards Committee carries out regular reviews of procedures and trends and makes recommendations to the Certification Board for further development of the schemes in line with continual improvement of best practice and any changing requirements of legislation.

BDA Certification is committed to supporting the integrity and development of biodynamic and organic agriculture through the delivery of its certification programmes. We work with farmers, growers, advisors and scientists to promote and develop sustainable methods of producing and processing wholesome and healthy foods for consumers.

A copy of this Policy, which is subject to review, is available to all BDA Certification employees, supporting staff, applicants and licensees of the schemes and to any other interested party.

### 2.0 Legal status and scopes

This Quality Manual satisfies the requirements of ISO/IEC 17065:2012, '*Requirements for bodies certifying products, processes and services*' and details the operations of BDA Certification's programmes.

BDA Certification has been established for the purposes of certifying biodynamic and organic food and non-food products. The need and importance for impartiality has been recognised as paramount to safeguarding the integrity

of the products and processes certified by BDA Certification and as such, the ultimate responsibility for all aspects of the organisation of BDA Certification rests with the Certification Board.

BDA Certification delivers certification schemes only to the following scopes:

- Production including agriculture, horticulture, orchard production and aquaculture according to and Demeter Production Standards the EU Organic Regulations
- Processing including packing, manufacturing, abattoir, tanning, catering, wholesale and distribution and animal feeds according to Demeter International Processing Standards and the EU Organic Regulations
- Importing and Exporting from and to third countries (Non EU member states) according to the EU Organic Regulations and Demeter Standards
- Cosmetics and Skin Care products in accordance with Demeter Standards

The relevant Standards are:

- ✓ Council Regulation (EC) No. 834/2007 and associated implementing rules on organic production of agricultural products.
- ✓ Demeter Production Standards;
- ✓ Demeter International Bee Standards
- ✓ Demeter UK: Aquaculture Standards (trout)
- ✓ BDA Certification Organic Production Standards
- ✓ Demeter International Processing Standards
- ✓ Demeter International Labelling Standards
- ✓ BDA Organic Processing Standards
- ✓ BDA Organic and Natural Tanning Standards

Licensees of the certification programmes must meet and maintain these standards within their organisation as applicable, in order to receive and maintain certification and thereby their license / certificate for Demeter and or organic food production or cosmetics.

BDA Certification is a member of Demeter International and, as such, is an internationally recognised certification body for biodynamic food and farming.

The Demeter and organic certification programmes operate in both the United Kingdom and the Republic of Ireland. In the UK, we are approved by the DEFRA as an organic certification body with the registration code GB-ORG-06. DEFRA approval is conditional upon on-going accreditation by the United Kingdom Accreditation (UKAS) Service to ISO/IEC 17065:2012. In the Republic of Ireland, we are approved by DAFM and our registration code is IE-ORG-05. BDA Certification's accreditation with UKAS in the UK is deemed equivalent in the ROI as part of a cross frontier accreditation agreement.

The procedures and policies in this Quality Manual relate to BDA Certifications Demeter and organic certification programmes.

BDA Certification is a department within the UK Biodynamic Association (BDA) which is a registered charity founded on the work of Rudolf Steiner with the objectives of developing and promoting knowledge of biodynamic agricultural methods for the betterment of farming, horticulture and gardening. The International Biodynamic Association (IBDA) is the owner of the Demeter trade mark and licenses the UK Biodynamic Association to administer the Demeter trade mark in the jurisdictions of the United Kingdom and the Republic of Ireland.

### **3.0 Responsibility for Quality Management**

The overall responsibility for the Quality Management of the BDA Certification schemes lies with the Certification Board.

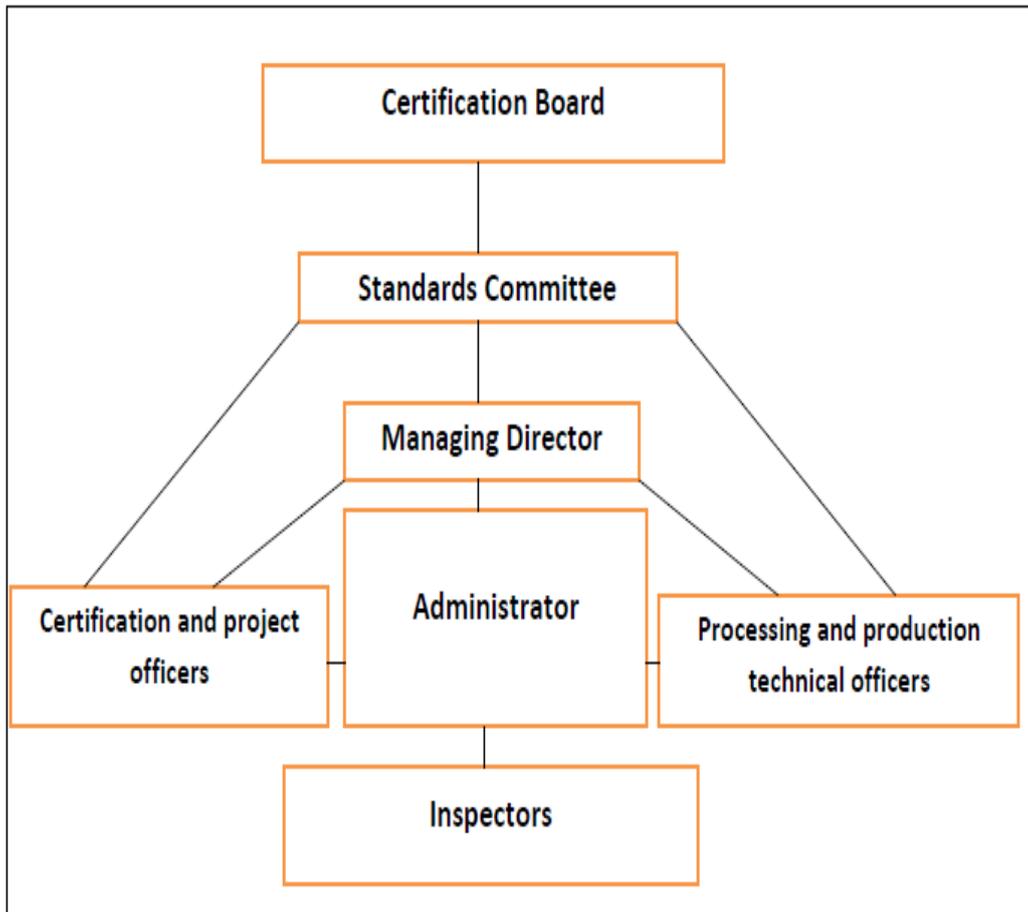
Day-to-day responsibility for implementation of Quality Management lies with the Managing Director, who raises any quality issues at Certification Board meetings. In instances where an arising matter needs immediate attention, the Managing Director will discuss this directly with the Chair of the Certification Board.

It is also required of all employed and contracted personnel acting on behalf of BDA Certification to take responsibility for Quality in their particular areas of involvement, and to liaise with the Managing Director on any matters of concern.

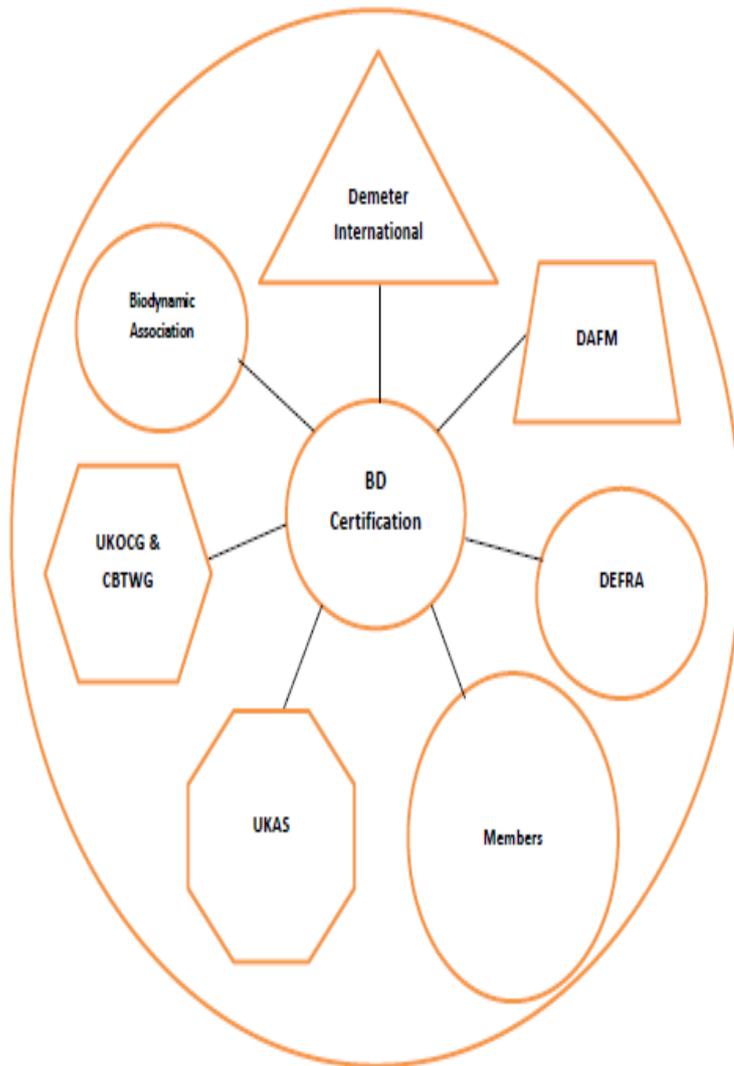
## **4.0 Organisational structure and third party affiliates**

### **4.1 Organisational structure**

BD Certification Organisational Structure



4.2 Third Party Affiliates



## 5.0 Constitution of the Certification Board

The Certification Board is the governing body of BDA Certification. The Certification Board's function is to oversee and steer the commercial direction and legal obligations of BDA Certification. The BDA Certification Board upholds the principles of the Demeter Standards and the EU Organic Regulations 834/2007, 889/2008 and ensures compliance with the requirements of BS EN ISO/IEC 17065:2012.

### 5.1 Objects

A primary responsibility of the Certification Board is to ensure that the certification programmes are impartial and that the interests of no single stakeholder group shall dominate. The policies and procedures of the certification schemes shall be documented in such a way that impartiality and a balance of stakeholder interests is assured.

The key tasks of the Certification Board include:

- Oversight of the management and operations of the certification schemes
- Formulate and agree policies and strategies that support the development of BDA Certification
- In conjunction with the Standards Committee, design and implement operational procedures for the certification programmes
- Overseeing the development of UK Demeter Standards and participating in the development of the International Demeter Standards
- Ensure that sufficient resources, especially financial and human, are available for the smooth running and development of BDA Certification
- Appoint appropriately qualified staff and keep an oversight of their performance, providing support where necessary
- Reviewing and revising where appropriate, the BDA Certification pay grades for staff and contractors and ensure these remain in close proximity to market rates
- Ratifying sanctions imposed on certificated licensees where appropriate
- Considering appeals, as outlined in section 14 of this manual '*Procedures for handling Complaints, Disputes and Appeals*' taking care to maintain its non-discriminatory approach and not compromising impartiality. To this end, and from time to time it may be necessary for a subgroup of the Board comprised of at most one certified producer to address appeals.

### 5.2 Composition

The Certification Board shall be composed of not less than 4 independent and suitably qualified persons representing as broad a range of stakeholder interests. The stakeholder interests that are to be represented, in as far as possible, on the Certification Board are the following:

- Farming
- Horticulture and Gardening
- Food Processing
- Consumers

- Environment
- BDA Certification Managing Director
- A member independent of any of the above interests to safeguard impartiality.

In addition to the areas of expertise represented on the Board, from time to time, and where necessary, the Board will invite people with other expertise to contribute to specialist areas of discussion, which are not represented through incumbent Board Members.

It is recognised that the unique nature of the certification operations can result in Board or staff members having a conflict of interest as either certified licensees or employees of BDA Certification. Therefore measures have been taken to safeguard impartiality.

A primary measure to safeguard impartiality is to appoint a board member who is independent of any of the main stakeholder interests listed above and has no direct involvement with day to day certification operations. This board member has a special task to safeguard the impartiality of the certification programmes delivered by BDA Certification. If this board member has concerns regarding impartiality that are not resolved by the Board within a reasonable period of time, recourse shall be taken to DEFRA, DAFM or UKAS as appropriate.

Certification Board members declare interests (either business interests or interests in related activities of the BDAA) that could present a conflict of interest with the tasks of the Certification Board.

### 5.3 Appointment

When a position becomes vacant on the Certification Board, a new board member can be proposed by an existing board member or BDA Certification may advertise the position in public domains. The appointment of new Board members must be agreed by a majority of incumbent Board members.

### 5.4 Training

Training in quality assurance / certification systems and BS EN ISO/IEC 17065:2012 is given to all members of the Certification Board on an on-going basis.

### 5.5 Officers

The Certification Board shall appoint a chairman and where appropriate, a member of the Certification Office staff may be appointed as secretary, in which case the secretary will have no voting rights on the board.

### 5.6 Reporting

The Managing Director is responsible for reporting and updating all Board members with regards to the status and development of all operational activities and projects undertaken by BDA Certification.

### 5.7 Terms of Reference

A. The term of office for members of the Board is 4 years. Reappointment for a second term of 4 years is possible. After serving two full terms and after a gap of one year, reappointment to the board for a further 2 terms is possible.

B. Board members who attend fewer than 50% of board meetings in any year may be voted off the board.

**C.** A quorum at board meetings shall consist of at least 4 members of the Board. However, should some board members be absent, care must be taken not to shift the voting in favour of certified licensees. Therefore at least 50% of those voting must not be certified by BDA Certification.

**D.** A Chairperson will be elected by the board for a 2 year term. Nomination for Chair shall be proposed and seconded by board members and approved by a consensus of members present (or by a majority vote if consensus cannot be achieved). Re-election for a further 2 year term is possible. The chair should be reviewed annually at the autumn board meeting.

**E.** In the absence of the Chair at any meeting of the Board, a substitute chairperson may be elected.

**F.** The Chair of the Board shall convene all meetings by notice to each member – not less than 3 times a year.

**G.** The agenda and relevant papers of a board meeting shall be circulated to all board members at least three days before the meeting.

**H.** Board members who are not able to attend a meeting may give input to the meeting through an attending board member. Proxy voting is allowed.

**I.** There will be no provision for appointing a deputy to take the place of a board member if he/she is unable to attend.

**J.** At any meeting of the Board, the Chair or other person presiding shall seek to arrive at decisions by consensus; failing this, a decision supported by two thirds of those eligible to vote shall be binding.

**K.** With the consent of the Chair of the Board, specialist advisors or guests may attend meetings of the board, but they shall not have voting rights or take part in decision making.

**L.** The Board shall agree an annual budget for the operation of BDA Certification programmes and projects. Under normal circumstances the income of the programmes must cover expenses and any surplus or deficit to requirements shall be reinvested in the business.

**M.** Board members will be paid travel costs for all meetings of the Board.

**N.** All persons that attend Board meetings must sign an undertaking agreeing to observe strict confidentiality with regard to all matters arising within the Board meetings.

### **5.8 Impartiality**

The Certification Board and the senior management team are fully committed to safeguarding impartiality and regularly conduct impartiality reviews.

A primary measure to safeguard impartiality is the appointment a board member who has the special task to safeguard the impartiality of BDA Certification operations. The appointed Board member shall lead the Board in a review of impartiality at the autumn convening of the board, following the procedure outlined in 5.9 below. When a breach of impartiality is identified, the following measures will be taken by the appointed board member and or senior management of the company:

- Where applicable, certification is suspended immediately
- Senior management of the certification department will conduct a review of the incident and present a clearly documented report to the Certification Board within 3 working days
- The Certification Board will review the findings of the report and will appropriate a corrective and preventative action plan within 1 working week
- UKAS will be presented with a fully documented report of the findings of the Certification Board and its actions to address the matter within 10 working days
- At the next convening of the Board, a review will be conducted on the matter and an assessment will be made to verify that the action plan has been implemented in a sufficient manner to ensure that impartiality has been maintained
- Senior management ensures, on an on-going basis, that any declared or discovered conflicts are managed in a manner appropriate to the safeguarding of impartiality and the integrity of the schemes

If the board member responsible for safeguarding impartiality has concerns that impartiality matters are not resolved by the board within a reasonable period of time, recourse shall be taken to UKAS as stated above.

All members of the Certification Board shall declare any interests, direct or indirect, that could present a conflict of interest with the tasks of the Certification Board.

### **5.9 Impartiality, Risk Identification and Consultancy**

The Certification Board and the senior management of the BDA Certification department are committed to safeguarding the impartiality of all its operations because it is recognised that the integrity, reputation and ultimately the long term sustainability of the company is dependent upon it. To this end, the Board has identified areas that present risks to the integrity of the certification programmes and as a measure to ensure that impartiality is maintained, the Board undertake the following to ensure that impartiality is maintained:

- All Board members declare any and all interests at the start of each meeting and shall not be given a vote on any matter where a conflict exists
- The Board reviews any new and existing licensees that may be seen to be seeking influence and the appropriate balance of interests will be discharged to resolve any potential conflicts
- The Board reviews its collaborations with other sector bodies to ensure that impartiality is maintained with its partners
- A review of any engagement in consultancy by any member of the Board or certification staff is also conducted and appropriate action is taken to prevent conflicted situations arising
- The Board reviews and ensures that all newly employed staff are bound by conflict of interest statements in addition to confidentiality statements

Conflict of interest and objectivity is addressed further by the Certification Board through annual staff training sessions and contractually binding agreements to ensure that all activities undertaken throughout the certification processes are conducted in an independent and impartial manner.

No part of BDA Certifications operations can be considered as consultancy. The BDA Certification Board offers technical support to its licensees via its technical officers and this forms a part of the impartial certification offering. Any member of staff engaging in consultancy work outside of their contractual responsibilities to BDA Certification must declare this.

All or any employees of BDA Certification that engage in consultancy to any certificated member will be prevented from engaging in any certification related tasks for a minimum of 2 years.

## 6.0 Standards Committee

The BDA Certification Standards Committee has been created to support the BDA Certification Board with the technical aspects of the implementation of its certification programmes. Members of the Standards Committee are tasked with ensuring accreditation is continued with Demeter International and UKAS. The Standards Committee also helps to ensure that impartiality is sustained and that the interests of no single stakeholder or group shall dominate.

### 6.1 Terms of Reference

The key tasks of the Standards Committee include:

- To oversee the management and operation of the certification programmes
- To maintain and where necessary formulate new operational policies and procedures for the certification programmes
- To oversee the development of the Demeter and Organic Standards and all other applicable standards
- To consider and propose a UK position on Demeter International standards amendments and developments
- To ratify suspension or withdrawal of certificates
- To consider appeals, as outlined in section 14, 'Procedures for handling complaints, disputes and appeals'), taking care not to compromise impartiality
- To review at least once a year how fit for purpose the operational activities / procedures are with the view of maintaining simplicity in all systems wherever possible
- To undertake specific tasks as requested by the Certification Board

### 6.2 Composition

The standards committee should be carried by a nominated chair and composed of at least:

- A certification officer
- A production technical officer
- A processing technical officer
- The Managing Director
- Any member of the certification board who wishes to participate

- Any other person with the necessary technical ability as agreed by both the chair of the Certification Board and the Chair of the Standards Committee
- a. The term of office for non-staff members is 4 years. Reappointment for a second term of 4 years is possible. After serving two full terms and after a gap of one year, reappointment to the board for a further 2 terms is possible. Employed staff may sit on the committee for the duration of their employment
- b. A Chairman will be elected by the Certification Board for a 2 year term. Nomination for chairman shall be proposed and seconded by board members and approved by a consensus of members present (or by a majority vote if consensus cannot be achieved). Re-election for a further 2 year term is possible. The chair should be reviewed annually at the autumn board meeting and a new chair should be appointed if the board chooses to do so.
- c. In the absence of the Chairman, the Managing Director shall chair the meeting
- d. The Chairman of the committee shall convene all meetings by notice to each member – not less than 3 times a year
- e. Papers relevant to the agenda of a meeting shall be circulated to all members at least three days before the meeting.
- f. At any meeting of the Committee, the Chairman or other person presiding shall seek to arrive at decisions by consensus; failing this, a decision supported by two thirds of those eligible to vote shall be binding. All decisions made shall be subject to the approval of the Certification Board.
- g. With the consent of the Chairman of the Certification Board, specialist advisors or guests may attend meetings of the Committee, but they shall not have voting rights.
- h. Meetings can be held via teleconferences or face to face meetings. Committee members will be paid travel costs for any meetings where travel is required. Additional remuneration for the Chairperson will be set at the annual budget meeting of the Certification Board.
- i. All who attend the Committee must sign an undertaking agreeing to observe strict confidentiality with regard to all matters arising within the Committee meetings.
- j. The Committee may propose changes to these terms of reference to the Certification Board. The Board will make the final decision

## 7.0 Certification Body Personnel

The BDA Certification Office employs staff and some functions of the certification programmes are fulfilled by self-employed individuals, notably the role of Inspectors.

All personnel, whether employed or self-employed, are required to sign a contract of employment or contract of service as appropriate, a confidentiality statement and a statement of conflict of interest. The confidentiality and conflict of interest statement is signed when a member of staff is first appointed to work for the certification schemes. Any conflicts of interest must be declared at that time. A new conflict of interest declaration will be completed and signed every year at the annual staff training days.

Personnel records, including name, address, educational and professional qualifications are retained by the Administrator. Staff work reviews and training records for each member of staff are retained by the Managing Director.

### 7.1 Recruitment Procedure

When a vacancy arises, BDA Certification policy is to advertise the post on its website and in periodicals such as national or international magazines.

An interview panel appointed by the Certification Board will interview the short listed candidates and select the most appropriate candidate.

### 7.2 Job Descriptions

#### 7.2.1 Managing Director

The Managing Director is responsible for the day to day operations of BDA Certification. He/she will oversee and monitor all aspects of the business to ensure that operating systems are followed and executed in an effective manner, especially with regards to quality management.

The Managing Director is responsible for the induction and management of all BDA Certification staff and is responsible for continual improvement and development of the Certification Programmes in line with ISO 17065/2012, EU Regulation 834/2007, and the Demeter International Statutes and Directions.

The reporting line is to the Certification Board.

#### Key tasks:

- Formulate and propose direction and strategy for the for the Certification Board
- Oversee the day to day operations of the business and ensure that the operating procedures are implemented correctly
- Coordinate monthly management group meetings
- Liaise with the chair of the Certification Board at least once per month
- Oversee the work of all Certification staff. Carry out annual work reviews for all staff, provide feedback, support and management
- Allocate work to BDA Certification staff as appropriate to their job descriptions, workload and skillsets including:
  - Inspections to appropriate inspectors
  - Inspection reports to appropriate Certification Officers
  - Initial applications to the certification programmes , including conversion and animal health plans
  - System development projects as and where appropriate
- Organise witnessed inspections for all inspectors annually
- Provide and/or organise training for all certification staff, members of the Certification Board and Standards Committee as appropriate
- Prepare annual operating and project budgets for the Certification Board
- Monitor approved budgets and take appropriate action if finances are not in line with the budget
- Authorise expenses for all staff in line with budgets
- Participate in key Demeter International meetings such as the Members Assembly and Certification Meetings

- Prepare and execute Demeter International Partner visits as required and carry out corrective actions
- Participate in the United Kingdom Organic Certifiers Group (UKOCG)
- Maintain good working relationships with other UK Organic bodies, DEFRA, DAFM and other key affiliates
- Participate in the IFOAM UK and English Organic Policy Forums
- Ensure that all reporting obligations to DEFRA, the Scottish and Irish Governments and Demeter International are accurate and within agreed timescales
- Respond to DEFRA, the Irish and Scottish Government consultations and requests for information as appropriate
- Ensure UKAS office assessments and witnessed inspections are sufficiently prepared for. Ensure that any corrective action is carried out and submitted to UKAS within agreed timescales
- Prepare and conduct annual internal audits and carry out corrective action within agreed timescales
- Review and revise operating procedures as set out in the Quality Manual and other documents of procedures
- Develop common operating procedures with other UK Organic Certification Bodies through participation in the Certification Bodies Technical Working Group (CBTWG). Develop BDA Certifications Demeter and Organic Standards in liaison with the Standards Committee, the Certification Board and Demeter International
- Contribute to the development of EU Organic Standards in liaison with DEFRA and the Irish and Scottish Governments
- Develop the business by growing the number of licensees
- Ensure that complaints are dealt with effectively
- Co-ordinate workshops and events for licensees
- Act as spokesperson to groups and the media about Demeter and Organic Certification, biodynamic agriculture and
- Provide presentations and talks on BDA Certification and the certification programmes

**Minimum Qualifications and Experience:**

Knowledge of and enthusiasm for biodynamic and organic agriculture, horticulture and food processing gained from practical and academic experience is expected.

Prior experience in management (relevant for a small office staff and a small team of inspectors) is essential. This should be at least three years in a relevant management position.

A detailed knowledge of Quality Assurance Systems and relevant EU Organic, UK and Demeter International Regulations and Standards is required. This expertise could be acquired by participation for at least three years on the Certification Board, participation in a related certification / quality assurance operation, or equivalent training courses.

In addition:

- A degree in a relevant field is required.
- IT skills, including website management of websites (Wordpress) use of Word, Excel, Outlook, and experience of databases (ideally Filemaker Pro) are required.
- Financial skills required to formulate and oversee the budgets of the BDA Certification
- Excellent communication and interpersonal skills are essential
- The ability to work independently and be self-motivated

- Willingness to travel

### 7.2.2 Certification Administrator:

The Certification Administrator is responsible for smooth running of the Certification Office and the implementation of the Certification Programmes operating procedures. The reporting line is to the Managing Director.

Key tasks are the following:

- Receive and deal with enquiries regarding the Demeter and Organic Certification programmes, and refer to the Managing Director or Technical Officer as appropriate
- Send information about the Certification programmes to interested parties
- Send an application form and invoice for application fee to all interested applicants
- Liaise with Inspectors regarding the timing of inspections
- Send inspection reports, invoices and all other certification programme documentation to the members
- Monitor corrective actions and liaise with the Certification / Project Officers regarding corrective actions. Send out Corrective Action Reports (CAR)
- Receive and bank fee payments from Licensees, and keep records of fees paid
- Send and receive contracts for use of the Demeter or Organic logos and Trademark, as appropriate
- Receive and refer to the Managing Director all appeals or complaints

Additional tasks:

- Maintain the register of members and certified products on the database
- Report to DEFRA, as required, on statistics, new applications, withdrawals, seed derogations, land derogations
- Report to Organic Aid Scheme, as required – withdrawals and applications;
- Maintain up to date records on the database including records of all inspection reports forms, certification decisions, certificates issued, correspondence with members, derogations, information, invoices, etc. all of which to be kept for 5 years
- Distribute revisions of Standards, operating procedures, newsletters, surveys and other documentation and information
- Provide a point of contact for members, DEFRA, other Organic Certification Bodies, etc.
- Write the minutes for the Certification Board meetings
- Update the website as and when required.
- Any other administrative and statistical tasks that arise

### Minimum Qualifications and Experience:

The Certification Administrator must have the ability to organise and administer a busy office. This requires at least three years of administrative experience and training in secretarial and/or administrative skills.

In addition:

- A diploma or equivalent in a relevant field is required
- IT skills, including email, Word, Excel and Outlook are essential.
- Good communication skills are required

- Experience in financial management is required
- The ability to work independently and be self-motivated is essential
- The ability to be discrete, diplomatic and able to observe strict confidentiality is essential

### 7.2.3 Production Technical Officer

The Production Technical Officers role is to provide expertise within the Certification Office with regard to all matters concerning biodynamic / organic farming, gardening, forestry and other areas of primary production.

#### Key tasks are:

- Dealing with enquiries from farmers, growers, foresters and others involved in primary food production who are interested in becoming biodynamic or organic certified with BDA Certification
- Provide Standards information and technical support for producers
- Development of the Certification Programmes with regard to primary production – revision and development of assessment forms, procedures and documentation
- Participation in the on-going process of reviewing and revising Demeter and Organic Production Standards in the UK, EU and Demeter International
- Occasional attendance at the Certification Board meetings, as required
- Liaison with other Organic Certification Bodies regarding primary production issues (CBTWG – Production)
- Liaison with DEFRA and devolved authorities regarding production issues through consultation processes and meetings
- Training inspectors with regard to production issues and
- Participation in workshops and events for producers

The reporting line is to the Managing Director.

#### Minimum Qualifications and Experience:

The following is required:

- Technical positions will be fulfilled by persons who have substantial practical experience in the sector
- Expertise in biodynamic, organic and sustainable production systems and the relevant regulatory structures that govern the sector (Especially EU Organic and Demeter Standards)
- Enthusiasm for and commitment to biodynamic, organic and sustainable production
- Have the ability to translate the requirements of Regulations and Standards into a workable Certification Programme
- The Production Technical Officer will hold a degree or equivalent qualification in Agriculture, Horticulture or related field and have at least two years of relevant experience
- Excellent research, communication and interpersonal skills
- Good IT and office skills, in particular use of Word, Excel and Outlook
- The ability to work independently or as part of a group
- Organise and plan work-loads effectively responsibly
- Willingness to travel

#### 7.2.4 Processing Technical Officer:

The role of the Processing technical Officer is to provide expertise within the Certification Office with regard to all matters concerning biodynamic, organic and sustainable food processing, packing, importing and retailing.

##### Key tasks are:

- Dealing with enquiries from food processors, packers, importers and retailers who are interested in Demeter or Organic certification
- Providing Standards information and technical support for processors, importers, wholesalers, distributors, brand owners and retailers
- Development of the Certification Programme with regard to food processing – revision and development of assessment forms, procedures and documentation
- Participation in the on-going process of assessing and revising Demeter and Organic Processing Standards in the UK, EU and Demeter International
- Attendance at the Certification Board meetings, as required
- Liaison with other Organic Certification Bodies regarding food processing issues (CBTWG – Processing)
- Liaison with DEFRA and devolved authorities regarding food processing issues through Consultation processes and meetings;
- Training Inspectors regarding food processing issues
- Participation in workshops and events for food processors, packers, importers and retailers.

The reporting line is to the Managing Director.

##### Minimum Qualifications and Experience:

The following is required for this position:

- Technical positions will be fulfilled by persons who have substantial practical experience in the sector
- Expertise in biodynamic, organic and sustainable processing operations and the relevant regulatory structures that govern the sector (Especially EU Organic and Demeter Standards)
- Enthusiasm for and commitment to biodynamic and organic food
- Have the ability to translate the requirements of Regulations and Standards into a workable Certification Programme
- The Processing Technical Officer will hold a degree or equivalent qualification in Food Processing / Technology or similar subject and have at least two years of relevant experience
- Excellent research, communication and interpersonal skills are essential
- IT and office skills, in particular use of Excel, Word and Outlook
- The ability to work independently, to organise work-loads effectively, and to take responsibility in project delivery
- Willingness to travel

#### 7.2.5 Certification Officer:

The role of Certification Officers is to review the compliance elements of inspections reports and certify members when compliance has been achieved. Certification Officers report to the Managing Director.

**The responsibilities of the Certification Officer are:**

- Review assessment reports
- Make certification decisions as outlined in section 9 'Operating Procedures for Assessments and Certification' of this Quality Manual

Certification Officers will have specialist expertise in production and or processing and will be allocated inspection reports on the basis of this expertise.

**Minimum Qualifications and Experience:**

Certification Officers are required to have detailed knowledge of the UK Demeter Standards and the EU Organic Regulations. This will be obtained through experience in Quality Assurance / Certification Systems or by means of other appropriate trainings.

An in-depth understanding of biodynamic, organic and sustainable production or processing is required for these positions. This experience can be gained by relevant industry experience or relevant courses, workshops or other suitable training. It is highly for these positions to be fulfilled by persons who have substantial practical sector experience.

Certification Officers will have obtained a degree in a relevant field. However, equivalent experience and training is also acceptable. IT skills in Excel, Word and Outlook are essential for Certification Officers as is the ability to work independently, to make sound decisions on Certification matters, and to communicate effectively with other members of staff and members.

Certification Officers must have the ability to work to deadlines, engage with members with a supportive and understanding approach whilst ensuring that impartiality is always respected.

**7.2.6 Inspectors:**

Inspectors are responsible for visiting members for the purpose of assessing their operation for conformity to Demeter and or Organic Standards.

Key tasks are as follows:

- Organise a tour of Inspections, as allocated by the Certification Office
- Assess operations for conformity to Demeter and/or Organic Standards
- Obtain from the member all relevant evidence in support of compliance required by the Certification Programme
- Identify any Non-Conformities to the Standards
- Effectively communicate any non-conformities to the members at the conclusion of the Assessment
- Complete a clear and concise inspection report for the Certification Officer, detailing all relevant information collected at the assessment visit, and identifying any non-conformity to the Standards.

### Minimum Qualifications and Experience

Inspectors must have knowledge of the principles of organic production and an understanding of Demeter and Organic Standards and have the ability to communicate clearly and write clear and concise reports.

To be an effective Inspector, an applicant needs to demonstrate both academic ability and practical experience. He or she must have sufficient maturity to enable them to handle potentially difficult situations and to make important decisions relating both to the integrity of Organic Standards and the effect on individual businesses. They should be able to maintain the confidence of the members at all times.

An applicant will have a degree in agriculture or other relevant field. Alternatively, it may be allowable to demonstrate satisfactory ability without such qualification if other aspects are fully met. This might be, for example, where an applicant can demonstrate relevant experience in an appropriate area of work or satisfactory service as an Inspector in a related field.

- Producer (Agricultural and Horticultural) Inspectors should possess a relevant qualification in Agriculture or Horticulture or similar subject. Producer Inspectors may also inspect Simple Processing, as defined in the DEFRA Processing Definitions.
- A Producer Inspector who wishes to undertake Simple Processing will need to demonstrate familiarity with those parts of the Standards relevant to such inspections, e.g. labelling, etc.
- Processing Inspectors (Higher) should possess a degree or equivalent in Food Processing / Technology. They should also have extensive relevant experience in the food processing industry and in particular where the degree or equivalent is not in Food Processing / Technology or a closely related subject.

The applicant will have obtained relevant work experience either during or after qualification. They will have obtained five years general work experience of which two should be directly relevant to the sector they wish to inspect. Producer Inspectors should have experience of a wide range of crop production and of livestock husbandry.

### 7.2.7 Project Officers

The project officer provides expertise within the Certification Office with regard to all matters concerning biodynamic / organic food production, processing, packing, importing and retailing. The role is primarily focused on supporting the review of reports and certifying members for compliance with applicable standards.

Project officers also engage on assigned development projects according to directions given by the Certification Board and or Managing Director.

#### Key tasks are as follows:

- Review Assessment Reports;
- Make Certification decisions as outlined in the operating procedures for assessments and certification, (Section 9.0 in this Quality Manual)
- The project officer will have specialist expertise in production and processing and will be allocated inspection reports on the basis of this expertise

- Dealing with enquiries from farmers, growers, food processors, packers, importers and retailers who are interested in certification for biodynamic / organic food and farming
- Providing Standards information for producers, processors, packers, importers and retailers
- Development of the certification system with regards to food production and processing – revision and development of assessment forms, procedures and documentation
- Participation in the on-going process of assessing and revising Demeter and Organic Standards in the UK, EU and Demeter International
- Attendance at Certification Board meetings, as requested
- Liaison with other Organic Certification Bodies including attendance at CBTWG
- Liaison with DEFRA and other public sector bodies
- Provide input into consultations from various stakeholder bodies as requested
- Training inspectors and certification officers as appropriate
- Participation in workshops and events
- Research and project oversight

#### **Minimum Qualifications and Experience:**

Project Officers are required to have detailed knowledge of the UK Demeter Standards and the EU Organic Regulations. This will have been obtained through previous experience in biodynamic certification systems or by means of appropriate training. Project Officers should hold a degree in a relevant field. However, equivalent experience and training is also acceptable.

Project officers require excellent IT skills, including Excel, Word and Outlook and the ability to work independently, make sound decisions on certification matters, and to communicate effectively with other members of staff.

### **7.3 Staff Training**

All new appointees will receive Induction Training to acquaint them with BDA Certification and the Certification Programmes. This will be provided by the Managing Director and or other employees as appropriate. All training will be recorded in personnel records.

#### **7.3.1 Training for Inspectors**

Inspector Training consists of a working knowledge of assessment procedures as specified in ISO /IEC 17020:2012 and this Quality Manual, the Demeter and Organic Standards as specified in the respective Standards. This training is delivered by the Managing Director and other appropriate members of staff.

Upon initial commencement of employment with BDA Certification, Inspectors will receive at least three accompanied Assessments which will be carried out with the Managing Director or a senior Inspector, in which case the senior Inspector will make a report to the Managing Director. Records of these accompanied inspections will be kept in the training records.

On-going training consists of annual Inspector Training Days with all inspectors, the Managing Director, Technical Officers and other members of staff (Administrator, Certification and Project Officers) as required. In addition, on-going feedback is given by Certification and Project Officers to inspectors.

### 7.3.2 Training for Certification Officers

All newly appointed Certification Officers shall receive at least two induction days on the Quality Manual and Standards. In the first year of work and for at least the first 25 reports allocated to that Certification Officer, the Managing Director or a suitable Senior Certification Officer will closely supervise the Certification Officers work. Each report will be reviewed by the Managing Director or suitable Technical Officer, and revisions will be made as appropriate before the report is signed off. Feedback will be given to the trainee Certification Officer for each of these reports.

### 7.3.3 Training for the Certification Board:

Regular training for Certification Board members will take place in conjunction with the Board meetings. At least one training sessions per year shall take place. This training will concentrate on the requirements of ISO 17065, but may also include aspects of the Quality Manual and Standards.

### 7.4 Witnessed inspections

The Managing Director or a Certification or Technical officer will carry out at least one witnessed inspection with each inspector annually. Various categories of inspections (i.e. Farming, Horticulture, Processing, Import and Abattoirs) should be witnessed in regular rotation over successive years for each inspector as appropriate. A record of witnessed inspections will be kept together with actions which result from them.

As part of BDA Certifications accreditation by UKAS, Witnessed inspections are conducted by UKAS on an annual basis. Inspectors who undertake this normally won't receive an additional witnessed inspection by BDA Certification in that year.

### 7.5 Staff Work Reviews

A work review is carried out annually for each member of staff by the Managing Director. A work review should be carried out annually for the Managing Director by the Chairman of the Certification Board or another person appointed by the Chairman. Work reviews should review work carried out since the last work review, identifying successes and problem areas, workload, salaries or fees, training needs, and any other areas of concern. Records will be maintained of all work reviews and any actions resulting from them.

### 7.6 Staff Expenses

BDA Certification employees are entitled to claim expenses for travel, accommodation and office costs as agreed with the Managing Director or the Certification Board. Self-employed Inspectors may invoice for travel costs as specified in the annually issued statement of inspector fees. Claims for expenses of employed staff and invoices for inspectors' fees shall be sent to the Managing Director who will review the expense claim or invoice and notify the member of staff if payment is authorised. Expense claims for the Managing Director will be reviewed and authorised by the Chair of the Certification Board.

## 8.0 Operating Procedures for Enquiries and Initial Applications

### 8.1 Applications to the Certification Schemes

When an enquiry is received in the Certification Office, the administrator will log the enquiry in the enquiry log. The Administrator will refer the person enquiring to the BDA website for further information or send information as appropriate (application form with application procedure, fee scale and guidance notes etc)

- 8.1.2** The administrator should invite the person enquiring to talk with an appropriate member of staff (Certification Officer, Technical Officer, or the Managing Director) by telephone if they have any questions or wish to discuss certification matters further.
- 8.1.3** Where appropriate a pre-inspection visit may be arranged to provide a further opportunity to answer questions and discuss conversion and other technical certification issues.
- 8.1.4** When an enquiry to the Certification Office results in an application to one of the Certification Programmes, the administrator sends the relevant application forms and an invoice for the application fee according to the fee scale. Alternatively the applicant may obtain the application form from the BDA Certification website.
- 8.1.5** Upon reception of the application form, together with payment for the application fee, the Administrator will review the application and any accompanying information and refer to a Technical Officer as appropriate. The Administrator and Technical Officer will ensure the application contains sufficient information to register the applicant in one of the Certification Programmes. The Administrator or Technical Officer will then complete an application report, specifying whether the application is approved (i.e. contains sufficient information required for registration). For production applications, the Technical Officer will specify the conversion period for the applicant. Any reduced conversion periods as permitted in the standards are normally specified in this report. The date that the application is received by the Administrator is normally the start date of the conversion period for farming and gardening application. This should be specified in the application report.
- 8.1.6** When the Administrator receives an approved Application Report, the Administrator requests, in consultation with the Managing Director, a BDA Certification Inspector to conduct an initial assessment visit to the applicant. At this stage the relevant information and checklists are forwarded to the applicant by the Administrator.
- 8.1.7** The initial assessment visit follows the procedures for assessments specified in section 9.0 below.
- 8.1.8** In the case of transfers from other Certification bodies, all the procedures cited in 8.0 – 8.1.7 must be followed. In addition, the administrator will obtain the licensee file from the previous Certification body and the Technical Officer will review the members' previous certification reports to determine the certification status of the new licensee.

## **8.2 Applications for additional land, enterprises, products or scopes of certification.**

- 8.2.1** Existing Producer Licensees who wish to enter additional land into certification should obtain an additional land application form from the Administrator or download this from the BDA Certification website, complete

the form and return to the Administrator. The Administrator will review the application and complete an Application Report in consultation with a Production Technical Officer. The Administrator will then send an application report to the member, copying in the Inspector allocated to that member. The Inspector will assess this area for compliance to standards at the next inspection.

- 8.2.2** Existing Producer members who wish to add a new enterprise to their registration should follow the procedures cited in 8.0 - 8.7 above.
- 8.2.3** Existing processing members who wish to add new products to their license will send a MIPS or SIPS specifying ingredients and suppliers of ingredients for the new products to the Administrator. The Administrator will send the MIPS or SIPS to the Inspector allocated to that Licensee who will assess for compliance to standards. The Inspector will report to the Certification Officer who will make a certification decision. If the product(s) are approved for certification, the Certification Officer will inform the member and the Administrator and the Administrator will then issue a new Certificate and Schedule (where relevant). The Certification Officer will request a spot inspection in cases where an on-site assessment is required to confirm compliance to standards.
- 8.2.4** Existing members who wish to add a new scope to their certification should follow the procedures laid down in sections 8.0 – 8.1.7 above.

## **9.0 Operating Procedures for Assessments and Certification**

- 9.1** The certification year runs parallel to the calendar year.
- 9.1.0** In February each year, the Administrator in consultation with the Managing Director, prepare a schedule for all inspections for the year and allocate those inspections to a suitable Inspector, whilst ensuring appropriate rotation of Inspectors (Inspectors may not inspect the same licensee for more than 4 successive years). In addition, the Managing Director will identify for each inspector their witnessed inspection for that year.
- 9.1.1** Each member registered with the Certification Programmes must be inspected at least once each calendar year. In addition 10% of the total number of BDA Certification members will receive an unannounced inspection, allocated in accordance with BDA Certifications risk based approach. The Administrator, in communication with the Managing Director, will also allocate inspections for new applicants to the Certification schemes during the course of the year as applications are received.
- 9.1.2** Inspectors will then prepare a proposed timetable for inspections over the course of the year and send this to the Administrator by the middle of March.
- 9.1.3** The Administrator, in communication with the Managing Director, will then review the proposed timetable and assess the distribution of inspections over the year. If there are too many or too few inspections at any times of the year, the Administrator, for the purpose of avoiding bottlenecks, will contact the relevant Inspector and ask them to revise their proposed timetables.

- 9.1.4** Unannounced inspections shall be allocated to inspectors according to BDA Certifications risk based approach. At least 10% of the total number of BDA Certification licensees must receive an unannounced inspection each calendar year. BDA Certification will determine those licensees who require an unannounced inspection on the basis of the outcomes of a risk analysis.
- 9.1.5** A second review of allocations should be completed by August of each year and additional spot or unannounced inspections also will be allocated at that time. The Managing Director will also review the progress of witnessed assessments and ensure that these are completed before the end of the year.
- 9.1.6** Unannounced inspections will be allocated for operations in which there are concerns about compliance to standards or in which there is outstanding information or documentation that has not been submitted in a timely manner.
- 9.1.7** Some unannounced inspections will be allocated on a random basis and will be completed without advance notice of the inspection being given.
- 9.1.8** For practical reasons the inspector may choose to give notice immediately before the inspection (maximum of 3 days) but this period will be kept to a minimum. Notice of a spot inspection can be given in advance as for an annual inspection.
- 9.1.9** Three weeks (or more) before inspection, the Inspector will confirm with the licensee in writing the date and time of the inspection visit. At that time the Inspector will send to the licensee the documents required for the assessment. The Inspector will check the inspection categories on their allocation list to ensure that the appropriate documents are sent to the licensee.
- 9.1.10** At the inspection, the Inspector should obtain all of the necessary information and documentation and ensure that each area of the licensees business is inspected at annual inspections.
- 9.1.11** At the end of the inspection, the Inspector will discuss his / her findings with the licensee and, when appropriate, inform them in writing of any non-conformities or missing documentation found during the inspection on the Assessment Results Form. The inspector will ensure that a signed copy of the questionnaire is obtained from the licensee and that a signed copy of the Assessment Results form is left with the licensee.
- 9.1.12** If a critical non-compliance or manifest infringement is found at the inspection, the inspector should notify the Administrator as soon as possible and at latest within one working day of the assessment. In this case the Inspector should also submit his report to the Certification Officer as soon as possible and in any case within two working days of the assessment.
- 9.1.13** If the Administrator is notified by the inspector of a critical non-compliance or manifest infringement, he /she should notify the Managing Director as soon as possible and at latest within one working day. The Managing Director shall decide whether the certificate shall be suspended pending the Certification Officer's

report. This decision shall be made as soon as possible and at latest within 2 working days. If the certificate is to be suspended, the Administrator shall inform the licensee as soon as possible and at latest within two working days of the decision by the Managing Director. Defra will be notified within 2 working days of any suspended certificates.

- 9.1.14** The licensee is given a maximum of two weeks from the date of the inspection to submit any outstanding information to the Inspector.
- 9.1.15** All non-conformities noted by the inspector at the assessment should be recorded in the non-conformance section at the end of the assessment report. Any required information that is outstanding at the end of an inspection is a non-compliance. Any outstanding information submitted or other non-conformities resolved subsequent to the inspection and before the assessment report is submitted to the Certification Officer should be marked, by the Inspector, in the conformance section of the report as 'resolved'.
- 9.1.16** The Inspector will then forward a completed assessment report, questionnaire and any other essential documents collected at the inspection to an allocated Certification Officer within 3 weeks of the inspection.
- 9.1.17** The Certification Officer will make the Certification decision, if necessary by conferring with a Technical Officer, and specify a timescale for any Corrective Actions required. If the Certification Officer identifies any errors or omissions in the report they should contact the Inspector and discuss it with them, if necessary asking them to revise and resend the assessment report. If the Certification Officer is still not able to clarify questions about the non-conformities or comments of the Inspector, the Certification Officer should refer the matter to a Technical Officer, who will resolve the questions with the Inspector.
- 9.1.18** In the case of non-conformity, if the corrective actions are not clear, reference should be made to a Technical Officer or the Managing Director.
- 9.1.19** In the case of a manifest infringement or critical non-compliance, the Certification Officer should review the inspector's report as soon as possible and consult with a Technical Officer or the Managing Director to confirm actions. The Certification Officer shall complete the report within 2 working days of receiving the inspector's report. A decision to suspend or withdraw a certificate can only be taken with the agreement of the Managing Director and the Standards Committee. This decision should also be communicated to the Chairman of the Certification Board. Such a decision must also be communicated to the DEFRA Organic Branch and to the appropriate office of Trading Standards.
- 9.1.20** The Certification Officer will enter the timescale for corrective action in the non-conformance section of the assessment report, specify that evidence of corrective action should be sent to the Administrator, and sign off the assessment report. Normally the Certification Officer sends a copy of the completed assessment report to the licensee within three weeks of receiving the report from the Inspector. The Certification Officer saves a copy of the completed assessment report on the database.

- 9.1.21** The Administrator checks the contact details on the questionnaire against the contact details entered on the database. If a unannounced inspection is recommended, the Certification Officer should send an email to inform the Administrator of this so that it can be included in the Allocations list. The Certification / Project Officer inputs Defra and BDA marketing statistics into the database or spread sheet as appropriate.
- 9.1.22** The Certification Officer sends an email to the inspector giving feedback and comments. A copy of the email is sent to the Administrator.
- 9.1.23** Where necessary, the Administrator will issue a revised Certificate, and also a schedule to the certificate as required.
- 9.1.24** Certificates may be signed by signatories appointed by the Certification Board (normally the Managing Director). Specimen signatures are submitted to DEFRA annually by 1 April as specified in the Schedule to the DEFRA Agreement with Organic Certification Bodies.
- 9.1.25** A schedule to the certificate will be issued for all producers, and for processors who sell their products to a buyer who is not the final consumer.
- 9.1.26** If there are non-conformities, evidence of Corrective Action is sent by the licensee to the Administrator. The Administrator sends the evidence of Corrective Action to a Certification Officer or Inspector (as specified) who will evaluate the Corrective Actions and complete a Corrective Action Report (CAR). A copy of the CAR is sent to the Technical Officer or a Certification Officer as appropriate.
- 9.1.27** To ensure corrective actions are closed out in the specified time frame, all Certification Officers are required to submit a procedure monitoring form.
- 9.1.28** The Technical Officer or Certification Officer makes the certification decision and signs off the CAR. The Technical Officer or Certification Officer sends a copy of the CAR to the licensee, and sends a copy of the CAR to the administrator. The Administrator prints the CAR, sends a copy to the licensee, and saves a copy of the CAR in the licensees file.
- 9.1.29** Following rectification of all Non-Conformities, the Administrator will issue a revised Certificate (where appropriate) to the licensee, and also a schedule to the certificate as required. If there is a change to the certificate and/or schedule details, new documents will be sent immediately. If there are no changes to document details, new certificates and schedule will be sent before the certificate expiry date.
- 9.1.30** To ensure all corrective actions are closed in a timely manner, all certification officers must complete and return the procedure monitoring form to the administrator by the end of each calendar month. The administrator will chase up any further required evidence. If, after the prescribed timescale for Corrective Action, no evidence of this is forthcoming, the Administrator will send a reminder. If evidence is still not forthcoming after a further two weeks, the Administrator will send a final reminder with a warning that

failure to submit corrective action within two weeks could result in suspension. The final reminder can be either in writing, or both by telephone and in writing. If after a further two week period no evidence is forthcoming, the Administrator should consult with the Managing Director about suspension of the certificate. The Managing Director will assess the level of risk posed to the integrity of the product(s) in question and inform the Administrator and Certification or Project officer whether to suspend the certificate or adopt an alternative response.

**9.1.31** The Certification or Project officer will record the decision of the Managing Director in the procedure monitoring form and where appropriate file any documentation in the licensee's folder.

## **10.0 Licensee Responsibilities**

**10.1.1** All BDA Certification licensees shall:

**10.1.2** On an on-going basis, comply with BDA Certification Demeter and or Organic Standards as revised from time to time. (All revisions to the standards will be notified to licensees).

**10.1.3** Agree to allow authorised BDA Certification, Competent Authority (DEFRA or DAFM) and UKAS personnel access to all aspects of your business for the purposes of certification including provision for examining documentation and records.

**10.1.4** Agree to keep a record, and make available upon request, of any and all complaints that relate to certified activities and products and to document all actions taken in response to such complaints.

**10.1.5** Notify the BDA Certification office without delay before making any significant changes to the operations of the business (significant changes mean any new enterprises, products or scopes. Please contact the BDA Certification office if you are unsure).

**10.1.6** In the event of non-compliance with the standards, rectify the latter within a specified time in order to maintain certification or in-conversion status. Upon suspension, withdrawal or termination of certification, agree to discontinue the use of any and all advertising material that references BDA Certification, any of its certification schemes or logos / marks.

**10.1.7** Accept that all certification documentation remains the property of BDA Certification and any reproduction of these documents for the purposes of verification and trade, will be done so in exact entirety.

- 10.1.8** In the event of withdrawal or suspension of certification from any certified products or operations, agree to inform in writing the buyers of those products that those products are no longer certified.
- 10.1.9** Accept that the BDA Certification Board is responsible for the final decisions regarding certification.
- 10.1.10** Agree to make claims regarding certification only for those scopes which are certified and not use certification status in such a manner that brings BDA Certification into disrepute. Further agree to use any of BDA Certifications logos only on food products for which a valid certificate has been issued.
- 10.1.11** Accept that BDA Certification may release information relating to inspection and/or certification to DEFRA, Trading Standards, Demeter International or another approved organic certification body only for the purposes of verifying the organic integrity of food products produced or traded.
- 10.1.12** Agree to pay BDA Certification the annual certification fee in accordance with the published fee scale and within the time frame indicated on each invoice.

#### **11.0 Procedures for Testing for Prohibited Substances including GE Material**

In accordance with Article 92(c) of EC Regulation 889/2008 (introduced by EC Regulation 392/2013) BDA Certification is required to analyse the risks posed to Demeter and organic integrity by assessing operators likelihood of compliance with the organic regulations (834/2007, 889/2008 and 1235/2008). The analysis that BDA Certification conducts twice per year is designed to provide a basis for determining levels of threat to the integrity of the Demeter and or organic products and is used for targeting products to be analysed for the detection of prohibited substances.

A copy of the BDA Certification Risk Analysis Procedure for Laboratory Testing and Unannounced Inspections is available on request from the BDA Certification office.

Laboratories used by the BDA Certification office are done so with respect to competence and accurate reporting systems (UKAS accredited, or equivalent, for relevant scope).

BDA Certification is obliged to share information about residue testing with DEFRA and DAFM on an ongoing reporting basis.

BDA Certification uses BNN values as trigger levels for residue testing. If a residue test confirms that an unauthorised substance is present above the BNN level, an investigation must follow. The outcome of the investigation is either removal of certification from the product or clear steps to prevent contamination recurring. If contamination is above the maximum residue limits established by UK or ROI law, certification is withdrawn automatically and a product recall must take place with immediate effect. Detailed national and international procedures for residue testing are in place and available from the BDA Certification office and are available on request.

## 12.0 Definitions of Non-Compliances, Sanctions and Timescales

This section details BDA Certifications policies and procedures for managing non-compliances, sanctions and the associated timescales. As a Defra and DAFM approved control body, BDA Certification is required to uphold Article 30(1) of Council Regulation (EC) 834/2007 which states that:

*“Where a severe infringement or an infringement with prolonged effect is found, the control authority or control body shall prohibit the operator concerned from marketing products which refer to the organic production method in the labelling and advertising for a period to be agreed with the competent authority of the Member State.”*

2. Where a severe infringement or an infringement with prolonged effect is found by BDA Certification, the period during which a BDA Certification licensee is prohibited from marketing organic products will be considered on a case-by-case basis.

With regards to functions for working with non-compliances and associated sanctions, BDA Certification operates within a framework that has been designed and which classifies 3 levels of non-conformities. The classifications are:

- Non-compliance
- Critical non-compliance
- Manifest Infringement

3. Two years will generally be seen as the appropriate period of prohibition for a critical non-compliance and manifest infringements. This is regarded as a baseline against which other prohibitions are considered. A two year period will in most cases allow sufficient time for operators to review their systems and implement compliant procedures. It also serves to offer consumers reassurance about the integrity of the biodynamic and organic sector. It reflects the fact that two years is the standard period used in the organic sector for converting conventionally-farmed land to organic.

The table below provides more detail on:

- the classifications (listed in column two (compliance)) of different types of non-compliance
- the types of actions that fall under each classification
- the action that BDA Certification will take in respect of each type of classification
- the timescales for taking action; and
- any follow-up action that might be necessary

4. The following are examples of critical non-compliances and manifest infringements:

- fraudulent activity e.g. passing non-organic products off as Demeter / organic
- incomplete records as a result of the deliberate omission of information
- deliberate use of prohibited substances
- two or more examples of behaviour that have a direct impact on the health and welfare of an operator's livestock assessed over a 12 month rolling period (depending on the severity of the case, one successful prosecution on these grounds could be sufficient to constitute a critical non-compliance or a manifest infringement; and
- failure, within a reasonable period, to correct three or more identified non-compliances

5. In determining the length of any prohibition, BDA Certification will consider both the circumstances of the breach and the circumstances of the operator. The following are examples of what are considered to be 'aggravating factors' and, if present alongside critical non-compliances or manifest infringements, are likely to increase the prohibition period; this is not an exhaustive list:

- Evidence that animals under the care/control of the operator have been subjected to avoidable physical harm/mutilation/malnutrition that is inconsistent with the standard of care that is expected from an operator
- The operator being obstructive towards any investigations undertaken by BDA Certification and/ or the Competent Authority (Defra or DAFM) following their findings
- Actions that have resulted in a public health issue
- Contamination of product due to inadequate measures to ensure separation of Demeter organic and non-organic products.
- Operator is unable demonstrate the organic status of a supplier of an ingredient used in a product.

In such cases, it may be considered appropriate to extend the prohibition period to more than two years. This will be dependent on the individual circumstances of the matter.

6. The following are considered to be 'mitigating factors' and, if present, are likely to reduce the prohibition period. Again, this is not an exhaustive list:

- The operator is a small undertaking with low turnover and more limited resource to address compliance issues
- The non-compliances were predominantly administrative (e.g. lack of traceability was due to poor record keeping) and were not deliberate
- The use of prohibited substances was shown to be accidental
- Any non-compliances in relation to animal health and welfare had only a minor or trivial impact on the health or wellbeing of the animals
- A processor takes immediate and effective action to implement suitable safeguards to ensure such an event is very unlikely to occur in the future, and can demonstrate to the satisfaction of BDA Certification and the Competent Authorities (Defra or DAFM) that the integrity of their organic production process has been re-established

Where such “mitigating factors” are in evidence, it is likely that the baseline two year prohibition period will be reduced in proportion to the non-compliances found and the background to the case. Any and all reductions will be determined on a case by case basis and mindful of the underlying critical non-compliances or manifest infringements.

7. BDA Certification will, in consultation with the Competent Authority, agree a suitable period of prohibition. BDA Certification will assess the circumstances surrounding the case and inform the Competent Authority, suggesting a suitable period of prohibition. The Competent Authority will then consider the case and confirm (with reasons) whether or not the suggested period of prohibition is considered to be appropriate.

8. Once the prohibition period ends, the operator can market products as Demeter and organic provided they are registered with BDA Certification and where necessary, have complied with any conversion requirements.

**Definitions of Compliance, Actions, Sanctions and Timescales**  
**(Examples in the relevant definitions sections are not exhaustive and others may apply)**

	<b>Compliance</b>	<b>Definition</b>	<b>Action / Sanctions</b>	<b>Time scale</b>	<b>Follow-up actions</b>
<b>1</b>	<b>Compliance</b>	Fully compliant. No issues raised.	None.	N/A	None.
<b>2</b>	<b>Comment / Observation</b>	The means of notifying general information regarding the standards. Example - references to: <ul style="list-style-type: none"> <li>Practices that could be improved e.g. to best practice.</li> <li>Interpretation of the standards laid down in the organic Regulations.</li> <li>Forthcoming changes to the standards.</li> </ul>	None.	To be notified by BDA Certification as applicable.	May be checked at subsequent inspection.
<b>3</b>	<b>Non-compliance</b>	A failure to comply with the required standards laid down in the organic Regulations that could compromise the integrity of the organic product if not corrected.	Renewal of certification is conditional on: <ul style="list-style-type: none"> <li>Corrective action to be agreed in writing by BDA Certification and the operator.</li> <li>Operator to commit to undertake corrective action within an agreed timetable.</li> <li>Evidence of compliance to be supplied by operator</li> </ul>	Operator to respond within time period set by the BDA Certification, not exceeding 30 days from the date of notification. Corrective actions to be implemented within a reasonable period agreed by BDA Certification taking account of	An additional inspection may be required, at the discretion of BDA Certification. Corrective actions to be verified at subsequent inspection.

			<p>and verified by the BDA Certification.</p> <ul style="list-style-type: none"> <li>Only where evidence of compliance cannot be supplied a statement of intent may be accepted (e.g. where a long term capital investment is required).</li> </ul>	<p>the type of non-compliance (e.g whether just a minor technical matter (such as record keeping) or potentially having wider repercussions (e.g. on livestock welfare) if not corrected).</p>	
<b>4</b>	<b>Critical Non-compliance</b>	<p>The integrity of the operation, product/batch or lot has been directly compromised or lost but can be recovered. Examples include:</p> <ul style="list-style-type: none"> <li>By accidental use/ substitution/ contamination of prohibited materials.</li> <li>Illegal/incorrect labelling.</li> <li>Excessive number of Non-compliances.</li> <li>Contamination with GMOs above detectable level.</li> <li>Contamination with pesticide above MRL.</li> </ul>	<p>Where a critical non-compliance is found as regards compliance with the requirements laid down in BDA Certification Standards, the control authority or BDA Certification will ensure that no reference to the organic / Demeter production method is made in the labelling and advertising of the entire lot or production run affected by this irregularity, where this would be proportionate to the relevance of the requirement that has been violated and to the nature and particular circumstances of the irregular activities. Information on critically non-compliant cases affecting the Demeter / organic status of a product will be immediately communicated between control bodies, control authorities, competent authorities and Member States concerned and, where appropriate, to</p>	<p>Decertification of land, product, batch, lot with immediate effect.</p>	<p>Before the suspension can be lifted:</p> <ul style="list-style-type: none"> <li>The operator provides evidence that the critical non-compliance has been corrected.</li> <li>Additional inspection at the discretion of the CB to check for full compliance (e.g. only where the suspension was found to be justified).</li> </ul> <p>Corrective action and status of decertified land, product, batch, lot to be checked at subsequent inspection.</p>

			<p>the European Commission. The level of communication shall depend on the severity and the extent of the critical non-compliance found.</p> <ul style="list-style-type: none"> <li>• Immediate verbal suspension/ decertification of the field, product, batch or lot by BDA Certification and an aim to inform the Operator in writing within three working days but no later than seven working days.</li> <li>• Referred to BDA Certification Standards Committee for confirmation/ decision.</li> <li>• Notify Competent Authority &amp; other CBs if product recall is needed.</li> </ul>		
5	<b>Manifest Infringement</b>	<p>A serious and chronic failure of the system where the integrity of the Demeter / organic production has been lost. Examples:</p> <ul style="list-style-type: none"> <li>• Deliberate fraudulent activities such as substitution of non-organic ingredients, passing off.</li> <li>• Contamination by prohibited materials through systems failure.</li> <li>• The repeated failure to correct previously identified non-compliances.</li> </ul>	<p>Where a manifest infringement or an infringement is found, the control authority or BDA Certification shall prohibit the operator concerned from marketing products which refer to the Demeter / organic production method in the labelling and advertising for a period to be agreed with the competent authority of the Member State. Information on cases of manifest infringements</p>	<p>Decertification of operator with immediate effect (for a period to be agreed by the Competent Authority).</p>	<p>BDA Certification and the Competent Authority to agree on a period during which the operator may not market organic products.</p>

			<p>affecting the organic status of a product shall be immediately communicated between the control bodies, control authorities, competent authorities and the Member States concerned and, where appropriate, to the European Commission. The level of communication shall depend on the severity and the extent of the manifest infringement found.</p> <ul style="list-style-type: none"> <li>• Immediate verbal suspension/ decertification.</li> <li>• Immediate notification to Competent Authority.</li> <li>• Referred to emergency meeting of the BDA Certification Standards Committee for confirmation/decisions. The Standards Committee meeting may be by teleconference or email.</li> <li>• Decertification confirmed in writing by BDA Certification, within the aim of three working days, but no more than seven working days.</li> <li>• Competent Authority informed of decision.</li> <li>• Local TSO and other CBs notified.</li> </ul>		
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			<ul style="list-style-type: none"> <li>Notify Competent Authority &amp; CBs if product recall is needed.</li> </ul>		
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## 13.0 Procedures for Derogations

### 13.1 Procedures for Production Derogations

#### 13.1.1 Seed Derogations

- If biodynamic or organic seeds are not available for a crop, or if biodynamic or organic seeds are not available for a particular variety and no suitable alternative biodynamic or organic variety is available, the licensee may apply for a derogation to purchase non organic seeds.
- The licensee must complete a seed derogation form and submit it to the BDA Certification Office.
- The licensee must provide evidence that seeds from a suitable variety from biodynamic or organic production are not available.
- The BDA Certification office will make a decision on the derogation and if approved, sign off and return the approved derogation form to the applicant for their records.

#### 13.1.2 CMS Hybrid Seeds

- Seeds produced with protoplasm and cytoplasm fusion techniques (cytoplasm male sterility or CMS) are prohibited by BDA Certification.
- Licensees are asked to check the CMS status of their seeds to ensure that they do not use seeds produced by these methods. BDA Certification Inspectors will check high risk seeds at the inspection.
- The Certification Office will check the CMS seeds list before approving a derogation to purchase non organic seeds

#### 13.1.3 General Production Derogations

- The licensee submits a written request for derogation. Normally this is by completing the standardised general derogation form and sending to the Certification Office. Alternatively the licensee may make a written request for derogation and the Certification Office completes the derogation form.
- The licensee must state the reason for the request and provide evidence that permitted alternatives are not available
- BDA Certification personnel will make a decision and if approved, sign off the derogation form and return to the licensee for their records

### 13.2 Procedures for Processing Derogations

If the derogation relates to the EU Organic Regulation EU 834/2007:

- The licensee submits a written request for derogation. Normally this is by completing a derogation form and sending to the BDA Certification Office. Alternatively the licensee may make a written request for derogation and the Certification Office will complete the derogation and return it to the licensee for their records.
- The licensee has to verify the reason for the request as well as evidence of unavailability or other alternatives
- If BDA Certification is authorised to approve the derogation, the Office decides on the derogation and if approved, signs off the derogation form and returns to the member for their records
- If BDA Certification is not authorised to approve a derogation, the request is forwarded to the relevant competent authority for a decision
- The Competent Authority will reply to BDA Certification who in turn will reply to the licensee.

If the request is for derogation that relates to the Demeter International Processing Standards

- The licensee writes to Certification Office requesting the derogation
- The licensee has to verify the reason for the request as well as evidence of unavailability or other alternatives
- The request is forwarded to the secretary of the Demeter International Standards Committee for a decision
- The Demeter International Standards Committee will reply to BDA Certification who in turn will reply to the licensee
- No direct request can be made to the Demeter International Standards Committee from the licensee

### **13.3 Procedures for Country Derogations (Exemptions) from Demeter International**

Normally only derogations (exemptions) specified in the Demeter International Standards may be granted by the national organisations. If particular circumstances apply in a country which justifies additional derogation from the Demeter International Standards, a request for a Country Exemption must be made to the secretary of the Demeter International Standards Committee. If approval is granted by the Standards Committee or Members Assembly as appropriate, a Country Exemption is agreed for a limited period. When the country exemption expires, a new application to the Standards Committee can be made. The Standards Committee may specify that products produced under a Country Exemption are for internal consumption only and may not be exported with a Demeter label.

### **13.4 Procedures for Undocumented Licensee derogation requests**

Experience has shown that from time to time documents get lost and or misplaced. In the event of this happening, Inspectors are asked to contact the office immediately and ascertain whether a derogation request has been submitted and issued. In the event that the office has no records of a derogation request inspectors will gather as much information as possible about the apparent request, highlight the matter in the inspection report and the Certification / Project Officer will make a decision on whether the derogation can be granted retrospectively or not. In addition, inspectors will remind licensees that it is their responsibility to have all required paperwork ready at the time of inspection and that any missing documents will be treated as a non-compliance.

## 14.0 Procedures for handling Complaints, Disputes and Appeals

### 14.1 Complaints Relating to Products

The responsibility for complying with the Standards, as prescribed by the Certification schemes, and for complying with statutory requirements, rests entirely with the licensee. Therefore, any complaint about a product, or any complaint arising from possible infringements of the Law shall be dealt with by the licensee concerned.

Complaints of this nature coming directly to the Office will be referred to the licensee concerned for appropriate Corrective Action to be taken.

Licensees are required to maintain a record of any such complaints and any subsequent action taken, which should be available to Inspectors during their annual inspection. The BDA Certification Office may request to be kept informed of the outcome of complaints and how these have been resolved.

### 14.2 Complaints relating to BDA Certification Schemes or complaints about licensees of the schemes.

On receipt of a written complaint concerning the certification programme or a licensee, the Administrator will acknowledge receipt of the complaint as soon as possible and in any case within 14 days, and refer the matter to the Managing Director, who will also notify the Chair of the Certification Board.

The Managing Director and the Chair will consider the complaint within two weeks and, where necessary, provide a timescale for further investigation. The Administrator will report their decision back to the complainant, advising them of any resulting further investigations required. The above timescale will be applied to all complaints, whether minor or serious.

In exceptional circumstances, where a decision cannot be agreed through this route, the matter will be brought for discussion to the Board.

### 14.3 Suspension or Withdrawal of Certificate

If a licensee is unable to comply with the Standards, as amended from time to time, the Certification Office may require the licensee to discontinue the use of its Certification Mark, or any claim of compliance with the certification scheme, with immediate effect, until it is satisfied that compliance is again achieved, or pending the results of an appeal.

If a licensee fails to comply with the Standards, as amended from time to time, the Certification Office may, as appropriate:

- Withdraw the Certificate, or reduce its scope, or
- Refuse to grant or renew the Certificate, or extend its scope

Such decisions, and the grounds for them, shall be communicated to the member in writing. The Administrator will also communicate such a decision to the Certification Board and to the appropriate competent authority and local Trading Standards Office.

#### **14.4 Disputes**

In the event of a dispute about or against any certification decision of the Office, the licensee will inform the Administrator in writing within two weeks of notification. A response will be made to clarify the decision and solve the dispute within one week.

#### **14.5 Appeals**

In the event that the dispute is not resolved, the licensee may wish to appeal against the decision. This should be within two weeks of the conclusion of the dispute process, informing the Administrator in writing of their wish to appeal.

A meeting of the Certification Board will be called to take place within four weeks, but preferably within two weeks, of such notice, and the appellant shall be given seven days' notice of the time and place for such a meeting. The decision shall stand, pending any meeting of the Certification Board.

At such a meeting, representatives of BDA Certification and the appellant shall be entitled to be heard in confidence. The decision of the majority of the Certification Board, as declared by its Chairman, shall be final. In the event that the appellant loses his/her case, they will become liable for costs. The resulting dialogue will be minuted.

#### **15.0 Document management, records and statistics**

##### **15.1 Responsibility**

The Administrator is responsible for document control and record keeping. The date of receipt will be recorded by the Administrator or other members of the office staff for all documents received in the Office from applicants or programme participants or relating to them.

Documents, as appropriate, will be distributed to licensees of the certification programmes, the Certification Board, Inspectors, and applicants to the certification schemes. Documents will also be available on the BDA Certification website.

##### **15.2 Records**

Records will be kept by the Administrator for a period of 5 years. This includes assessment forms, assessment summary sheets, certification officer reports, corrective action reports, staff records, and registers of certification programme participants. After 5 years these records will be destroyed in a secure manner. Records of a more permanent nature will be kept by the administrator for as long as licensees are registered with the schemes. This includes application forms, up to date maps, conversion plans, animal health plans, and contracts.

Records will be kept in an electronic format. Records that are kept on the BDA Certification database are password protected and further secured on the BDA Certification servers.

Records relating to applications and assessments are confidential and may only be released to an outside party with the permission of the scheme participant.

Staff training and appraisal records will be kept by the Managing Director and a copy will be kept by the Administrator.

### **15.3 Document Control and Document Register**

All essential scheme documents including standards, forms, contracts, etc. will be identified by a document name or number and an issue date comprised of month and year. The issue date identifies the version of document that is currently in use. All essential scheme documents will be listed in the BDA Certification document register. Documents routinely required by licensees are available on the BDA Certification website.

### **15.4 Amendments to Standards and procedures**

From time to time standards and documents may be revised. Demeter Standards will be revised in accordance with changes agreed at the annual Demeter International Members Assembly in June. Organic Standards will be revised in a timely manner as required by each revision of the EU Organic Regulation as notified to the BDA Certification by the competent authority.

When a revision to the standards is undertaken, the Administrator will place a copy of the changes on the BDA Certification website and inform licensees. Paper copies will be sent out when requested. The office will keep a record of amendments to standards.

Forms, checklists and other documents will be revised as necessary. Whenever a revision is made to a form, checklist, or other official document, a new issue date (month and year) will be given to the document in the footer on the right side. The revised document is sent to the Administrator or other appropriate person to place or update on the document register. All staff will refer to the document register and to the date reference of documents to find the current version of a document. Amended documents will be issued, as specified on the document register.

Where necessary, the Administrator will advise licensees on the timescale requirement for implementing any changes to their procedures and the operation of the certification scheme.

Inspectors will ensure that licensees are operating from the latest Issues of documents during their annual assessments and record this on their checklist.

### **15.5 Register of Licensees**

A Register of licensees will be maintained by the Certification Office. The Administrator will submit this on an annual basis to DEFRA and other competent authorities as appropriate. In addition, in conformity with the requirements of Council Regulation (EEC) 834/2007 and its implementing rules, contact details (i.e. names and addresses only) from the Register will be available to anyone requesting them.

### **15.6 BDA Certification Quality Manual**

Copies of this Quality Manual will be made available to members of the Certification Board, Office Personnel, Inspectors, and UKAS. The Quality Manual will be available to licensees on the BDA Certification website. A paper copy will be sent to any licensee who requests one.

### **15.7 Notification of Change in Status of licensees**

Licensees will be asked by the Administrator to notify the office of any changes in their circumstances, e.g. a change of named person holding the certificate of registration or resignation from the certification schemes. In some circumstances the Administrator may request the return of documents to the office.

### **15.8. Competent authority approval, agreements and reporting requirements**

BDA Certification is approved as an organic control body by Defra in the UK and DAFM in the Republic of Ireland. These approvals are based on contracts held with Defra and DAFM. The contracts specify the responsibilities of BDA Certification as a control body and give details about grant payments made to BDA Certification for the reporting of data and information.

### **15.8 Statistics**

One of the reporting requirements referred to in 15.8 above relates to organic statistics. In addition to the organic statistics required by Defra and DAFM, Demeter International have asked for statistics with regard to biodynamic production. These organic and biodynamic statistics are recorded on the assessment forms and collected at inspections. The Certification / Project Officer will record these statistics on the certification database. A report of organic statistics will be submitted to the Defra Stats Team by the Administrator by 31 January each year in the format provided by Defra. A report of biodynamic statistics will be returned to Demeter International by the 30 April.

### **16.0 Internal Audits**

Internal Audits of the Quality System will be conducted annually in line with ISO 17065. Internal Audits are conducted to ensure that:

- BDA Certifications operating system is suitably documented;
- Operations comply with the documented system and that they satisfy the requirements of ISO 17065; and
- There is recorded evidence of the effectiveness of the System.

A member of the Office Staff, Certification Board or other nominated person will conduct the Internal Audits. The Internal Auditor will have received training in internal auditing skills – either in house or on a course held by an appropriate external body.

Results of the Audit will be discussed with the personnel responsible and Corrective Action planned, where necessary.

Records of findings at the Internal Audit will be kept on the Internal Audit Conformance Report. This report will refer to headings from the Internal Audit Agenda. Evidence of conformance will also be recorded on this report. A timescale for improvement action will be specified at the end of the report and this shouldn't be longer than 28 days. The Internal Auditor will receive evidence of improvement action and record completion of improvement actions on the Internal Audit Conformance Report.

If the Managing Director feels there is something which requires immediate action, this will be implemented promptly. A summary of the findings of the Internal Audit can be reported to the Standards Committee.

### 17.0 Management Review

The Quality System is subject to review by the Standards Committee and the management group. The management group is composed of the Managing Director and other senior staff with management responsibility. The Standards Committee will ensure the continued suitability and effectiveness of the System to comply with the requirements of ISO 17065.

Standards Committee meetings will be held on a regular basis, at least once every 3 months. Minutes will be taken. Actions will be recorded and monitored and the minutes will be forward to the Certification Board. Review of the Standards Committee minutes is a standing item on the Certification Board agenda.

### 18.0 Procedures for managing situations not documented in the Quality Manual

The BDA certification quality manual may not always contain policies for the management of situations. In such instances the following process will be followed:

- A) The staff member, if not the Managing Director, that discovers such a situation should in the first instance inform the Managing Director
- B) The Managing Director will discuss with that member of staff appropriate actions for dealing with the situation in an interim period
- C) The Managing Director will design an appropriate policy that will address and clearly identify procedures that ensure compliance with all applicable regulations and standards
- D) The Managing Director will propose any such policy to the Certification Board at their next convening. The Certification Board will, by way of a majority vote, adopt or refuse the proposal. If the proposal is adopted, the policy shall be written into the relevant section of the quality manual and signed off by the Chair of the Certification Board. If the proposal is refused, the Managing Director, in conjunction with the chair of the Board, will redesign the policy until it is accepted by a majority vote.
- E) The timeframe for the implementation of any and all such policies should not exceed 3 months.

### 19.0 Glossary of Terms

#### **Applicant**

An organisation or person applying for, but not yet been granted, Certification.

#### **BDA**

The Biodynamic Association

#### **Biodynamic Foods**

Foods which have been produced in accordance with Demeter Standards for biodynamic food production

#### **Biodynamic Preparations**

Specialist biodynamic field sprays and compost preparations. The preparations are made from natural materials and act as 'bio catalysts' to activate biological processes in soils and plants. Use of the biodynamic preparations is an essential requirement for Demeter Certification

**Biodynamic Unit**

A Certified Producer, or an Applicant in the process of Conversion, participating in the Certification Scheme for Biodynamic Food Production.

**Certificate**

A Certificate issued by the BDA Certification office to registered operators on an annual basis, in recognition that their operational procedures and practices for a specified range of products have been assessed, through Inspection, and are produced in accordance with the relevant Demeter or Organic Standards, as appropriate

**Certification Programme**

A scheme designed to certify conformity with defined operational procedures and practices that meet the requirements of the Demeter and/or Organic Standards

**Certifying Authority**

BDA Certification.

**Competent Authority**

Defra in the UK and DAFM in the Republic of Ireland. Departments in governments that are legally responsible for implementing and upholding statutory regulations.

**Complex Processing**

Where raw materials are processed in such a way that the nature, weight, or volume is transformed in such a way as require processing qualifications to ensure compliance with standards (e.g. cooking involving weight loss, dehydration, re-hydration, evaporation, emulsification, fermentation)

**Contract**

An agreement between the BDA Certification and a licensee, granting a non-exclusive licence to use the Demeter Trade Marks, or BDA Certification Organic Logo, as appropriate, on agricultural and food products which have been produced in accordance with Demeter and/or Organic Standards.

**Conversion**

Process of changing from conventional to biodynamic and or organic production

**Critical Non-Compliance**

See Section 12.0

**DAFM (Department for Agriculture, Food and the Marine)**

The Competent Authority in the Republic of Ireland, under EU Legislation, on organic food production.

**DEFRA (Department for Environment, Food and Rural Affairs)**

The competent authority in the UK, under EU Legislation, on Organic Food Production.

DEFRA is responsible for:

- Approval of Organic Certification Bodies
- granting derogations for use of non-organic agricultural ingredients
- Representing the interests of the UK with regard to organic standards and procedures at the European Commission, and other matters, as defined by the EU Organic Regulations 834/2007.

**Certification Board**

Governing Body for BDA Certification. Responsibilities, operating and terms of reference are outlined in the Constitution for the Certification Board, Section 5.0 of this Quality Manual.

**Demeter Standards**

Demeter Standards for Biodynamic Food Production.

**Holding**

A Farm, or area of land, the boundaries of which are clearly defined and explicitly described on a map, and which is large enough to permit a biodynamic/organic farming or horticultural operation to be developed and sustained.

**Inspector**

A person appointed by the Certification Board and trained by the Manager and other certification staff to carry out assessments of members for compliance to Demeter and Organic Standards.

**Member**

A Producer, Processor, Trader or Abattoir holding Certification to Biodynamic / Organic Standards.

**Manifest Infringement**

See Section 12.0

**Non-Compliance**

See Section 12.0

**Quality Manual**

Document describing Operating Procedures and other details of the Certification Programmes.

**Premises**

A production unit, located on a single site, in which the processing and/or manufacturing of Biodynamic/Organic foodstuffs takes place.

**Simple Processing**

Where raw materials are processed in such a way that traceability and mass balance are not difficult for an inspector qualified to producer level (e.g. cleaning, peeling, chopping and

slicing, packing, blending, processing of single ingredient products where the nature is not changed such as flour milling, simple butchery)

### Spot inspection

A spot assessment is a notified assessment in addition to the annual assessment that is undertaken for operations in which there are concerns about compliance to standards or in which there is outstanding information or documentation that has not been submitted in a timely manner, or that are randomly allocated to provide additional verification of compliance to standards.

### Standards

- Demeter Standards for Biodynamic Food Production
- Council Directive (EEC) 834/2007 on organic production of agricultural products and its implementing rules.

### Unannounced Inspections

An unannounced assessment is an assessment undertaken with minimum notice (maximum 3 days) for operations in which there are concerns about compliance to standards or in which there is outstanding information or documentation that has not been submitted in a timely manner, or that are randomly allocated to provide additional verification of compliance to standards.

## 20. Annex 1. Current BDA Certification Personnel

The following is a list of the current personnel employed by BDA Certification:

- Managing Director: Tarry Bolger
- Administrator: Margaret Richardson
- Certification and Project Officers: Gabriel Kaye, Jessie Marcham, Timothy Brink and Tom Petherick
- Processing and Production Technical Officers: Richard Swann and Tarry Bolger
- Inspectors: Richard Thornton Smith, Timothy Brink, Fergus Cronin, Tom Petherick, Rienk ter Braak, Paul Bell, Richard Swann



**GB-ORG-06**



**BD Certification**  
offering  
Demeter and Organic Certification  
**GB-ORG-06**

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