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Brief Introduction of Crop and Wild Harvest requirements

	NOP	COR	EU
<p><b>Organic production and handling system plan</b></p>	<p>To apply for organic certification, operator must describe production, handling details in an <b>Organic System Plan (OSP)</b> template provided by ZENITH upon request by applicant and operator. The description requires how your farming, handling and/or processing practices meet organic standards. The OSP should clearly explain your operating plan, including information on crops, animals, harvests, sales, records, soil-building practices, pest management, health care, pasture, and any other practices related to organic production.</p> <p>Once completed, producers and handlers will send the OSP to ZENITH as a part of their certification application.</p> <p>Operator must be transparent in Sharing their Plan information in ZENITH OMP form. This includes but not limited to as mentioned below:</p> <ul style="list-style-type: none"> <li>☑ A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed, monitoring practices in order to verify that the plan is effectively implemented;</li> <li>☑ A list of each substance to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability. Prior approval for use of any input including seed before its application/ sowing is mandatory. Operator must submit Input approval request to ZENITH.</li> <li>☑ A description of the recordkeeping system implemented to comply with the requirements</li> <li>☑ A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production operations and products with prohibited substances.</li> <li>☑ Genetically modified organisms (GMO) are not allowed.</li> <li>☑ A farm may submit a conservation plan created with the USDA Natural Resources Conservation Service to demonstrate how it maintains or improves natural resources. Similarly a food processor may submit a hazard analysis and critical control point plan to show how it prevents the contamination of organic products by prohibited substances.</li> <li>☑ It is particularly important that the operation notifies immediately about the application of a prohibited substance, whether intentional or unintentional.</li> </ul>		
<p><b>Split and Parallel Production</b> <i>(An operation that produces or handles both organic and nonorganic agricultural products/ in-conversion products)</i></p>	<p><b>Allowed</b> Management practices and physical barriers (distinct, defined boundaries) must be established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances throughout stage of production and handling with effective documentation and recordkeeping. <b><i>(The operator shall maintain verifiable, accurate records of both non-organic and organic produce right from their production, harvesting, storage, processing, packaging, transportation and marketing)</i></b> Production methods shall not alternate between organic and non-organic on a production unit.</p>		<p><b>Split : Allowed ; Parallel : Restriction</b> The entire agricultural holding must be managed in compliance with the requirement applicable to [EU] organic production.</p> <p>Non-organic and organic units in the same area are subject to specific control requirements that could include physical, financial, and operational separation (including storage premises) and that all measures are in place to prevent commingling and contamination.</p> <p><b>For perennials</b>, split production is allowed. In case of parallel production (different varieties that</p>

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		<p>cannot be easily differentiated or the same varieties, may be involved) , operation must have conversion plan, not to exceed five years(conversion of the last part of the area related to the production in question to organic production must begins as soon as possible and must be completed within a maximum of five years). The producer must also inform the inspection body 48 hours prior to harvest of such perennial crops. Exact quantities of harvest must be reported immediately upon completion of the harvest. The same is true for products of agricultural research and production of seed, vegetative propagating materials and transplants.</p>	
		<p><b>Parallel Production:</b> The operation can be converted one production unit at a time, and each converted production unit have to fulfil standard requirements. The exception to this norm, parallel production, is only allowed in the following cases: a) annual crops harvested during the final 24 months of the transition period when fields are added to existing operations; b) perennial crops (already planted); c) agricultural research facilities; and d) production of seed, vegetative propagating materials and transplants.</p>	
<p><b>Land requirements/ Conversion period</b> <i>(A conventional farm must undergo a conversion period before products can be sold as organic. During the conversion time, all rules of organic production must be kept, according to standard)</i></p>			
<p><b>Annual crops:</b></p>	<p>Had no prohibited substances applied on land for 36 months until harvest</p>	<p>Three years until harvest. This standard shall be fully applied on a production unit for at least 12 months before the first harvest of products. <i>*According to Safe Food for Canadians Regulations (SFCR) 344.3 the application must be filed within 12 months before the day of any of the food</i></p>	<p>24 months before sowing</p>

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		<i>commodities is expected to be sold or in case of an application for the organic certification of the food commodities, atleast 15 months before that day.</i>	
<b>Perennial crops:</b>	Had no prohibited substances applied on land for 36 months until harvest	Three years until harvest. This standard shall be fully applied on a production unit for at least 12 months before the first harvest of products. <i>*According to Safe Food for Canadians Regulations (SFCR) 344.3 the application must be filed within 12 months before the day of any of the food commodities is expected to be sold or in case of an application for the organic certification of the food commodities, atleast 15 months before that day.</i>	At least three years before the first harvest <b><i>(In the case of grassland or perennial forage, during a period of at least two years before its use as organic feed)</i></b>
<b>Beginning of conversion period:</b>	Last use of prohibited substances	Last use of prohibited substances. The application for certification must be filed 15 months before the day on which the product is expected to be Sold as Organic. Shall be fully applied on a production unit for at least 12 months before the first harvest of organic products	Date of Application submission to ZENITH
<b>Exceptions/Derogations:</b>	Past 36 Months history		Operator can provide proof that the land parcels were natural or agricultural areas that, for a period of at least three years, have not been treated with products or substances that are not authorized for use in organic production. <b><i>Refer ZENITH derogation Policy/Form for further Details.</i></b>
<b>Sale of products during conversion:</b>	Must be sold as conventional.		From second year of conversion on, products can be labelled as “in conversion” to organic farming.  <b><i>(Note: At least 12 month Conversion period must be complied in order to claim in-conversion)</i></b>  ✓ <b><i>Plant reproductive material, provided that a conversion period of at least 12 months has been complied with;</i></b> ✓ <b><i>Food products of plant origin and feed products of plant origin, provided that the product contains only one</i></b>

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		<p><i>agricultural crop ingredient, and provided that a conversion period of at least 12 months before the harvest has been complied with</i></p>
<p><b>Soil fertility and crop nutrient Management</b></p>	<ul style="list-style-type: none"> <li>○ Tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.</li> <li>○ Must manage crop nutrients and soil fertility through rotations, cover/catch crops, legumes, deep rooting plants and the application of plant and animal materials.</li> <li>○ For perennial crop systems include the methods used to promote diversity of plants (e.g. alley cropping, intercropping, hedgerows, or other conservation methods).</li> <li>○ <u>Authorized Substance List:</u> <ul style="list-style-type: none"> <li>● NOP: <a href="#">Allowed and prohibited substances, methods, and ingredients in organic production and handling.</a></li> <li>● <a href="#">Materials for Organic Crop Production</a></li> <li>● COR : <a href="#">Table 4.2 (Column 1 or 2) of CAN/CGSB-32.311</a></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>— Except in the case of grassland or perennial forage, by the use of multiannual crop rotation including mandatory leguminous crops as the main or cover crop for rotating crops and other green manure crops;</li> <li>— In the case of greenhouses or perennial crops other than forage, by the use of short-term green manure crops and legumes as well as the use of plant diversity; and The application of livestock manure or organic matter, both preferably composted, from organic production increase fertility and biological activity of the soil.</li> </ul> <p><i><b>*Mineral nitrogen fertilizers shall not be used</b></i>  <a href="#">List of Authorized Substances</a>  <a href="#">Additional List</a>,  <a href="#">Amending to above list of Authorized Substance</a></p>
	<p>Organic manuring should be used to maintain soil fertility</p>	
<p>Raw animal manure</p>	<p>Applied to land used for a crop not intended for human consumption (<b>Eg. Cotton, Cattle Feed, etc</b>) <u>{NA for COR}</u></p> <p>Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles (<b>Eg. Potato, Carrot, etc</b>);</p> <p>Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles (<b>Eg. Corn, Sunflower, etc</b>);</p>	<p>The total amount of livestock manure applied on the holding may not exceed 170 kg of nitrogen per year/hectare of agricultural area used.</p>

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		<p><b>Additional COR criteria:</b>          Animal manure produced on the operation shall be used first. When all available manure is used up, organic manure from other sources may be used. If organic manure is not commercially available, non-organic manure is permitted provided that:</p> <p>a. the non-organic source is not a fully caged system in which livestock cannot turn 360°; and</p> <p>b. livestock is not permanently kept in the dark; and</p> <p>c. the source and quantity of manure, type of livestock, and evaluation of the criteria in a and b shall be recorded.</p>	
<p><i>*Organic operations should make it a priority to use manure obtained from transitional or extensive livestock operations, not from landless livestock production units (i.e not organically managed) or from livestock operations that use genetically engineered (GE) ingredients or GE derivatives in animal feeds.</i></p> <p>The manure application program shall address land area, rate of application, time of application, *Additionally retention of nutrient components must also be recorded by COR operations (<a href="https://bestsoiltestkits.com/diy/how-to-test-soil-nutrient-retention">https://bestsoiltestkits.com/diy/how-to-test-soil-nutrient-retention</a>) .</p> <p>'No additive to manure' statement – if you purchase manure</p>			
<p><b>Compost</b></p>	<p>I. Established an initial C:N ratio of between 25:1 and 40:1; and</p> <p>II. Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or</p> <p>III. Maintained a temperature of between 131°F and 170°F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.</p>	<p>Compost produced on the farm shall conform to the criteria specified in <a href="#">Table 4.2 Compost feedstocks</a>. In addition, if made from animal manures or other likely sources of human pathogens, compost produced on the farm shall:</p> <p>a. Reach a temperature of 55 °C (130 °F) for a period of four consecutive days or more. The compost piles shall be mixed or managed to ensure that all of the feedstock heats up to the required temperature for the minimum time; or</p> <p>b. meet limits for acceptable levels (Most</p>	<p>The total amount of livestock manure applied on the holding may not exceed 170 kg of nitrogen per year/hectare of agricultural area used. That limit shall only apply to the use of farmyard manure, dried farmyard manure and dehydrated poultry manure, composted animal excrement, including poultry manure, composted farmyard manure and liquid animal excrement.</p>

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		Probable Number of per gram (MPN/g) total solids) of human pathogens specified in Guidelines for Compost Quality;	
<b>Seeds, seedlings and vegetative planting material</b> * It is Mandatory to have Non organic seed/Planting stock approval prior to Sowing. <i>(Seed/ Planting stock Assessment, Organic Seed/ Planting stock Searches , Any Test Report {if available} must be Submitted for Evaluation)</i>			
Origin of seeds and vegetative planting material	Shall give preference to organic Origin.		
Use of non organic seeds or planting material	<p>In-conversion or non-organic plant reproductive material may be use in an organic production unit when equivalent organic plant reproductive material is not available in sufficient form ,quality or quantity. Farmer/Operation must prove non-availability of organic seeds or planting material.</p> <p>Commercial availability refers to the ability to obtain a production input, in this case seed or planting stock, in an appropriate form, quality, or quantity to fulfill an essential function in organic production. For the purposes of this exception, an “equivalent variety” is a variety of the same “type” (e.g. head lettuce types versus leaf lettuce types) or has similar agronomic or marketing characteristics needed to meet site specific requirements for an operation. These characteristics may include, but are not limited to: number of days until harvest; color, flavor, moisture, chemical, or nutrient profiles of the variety of the harvested crop; vigor or yield of harvested crop; regional adaptation, disease and pest resistance, or the plant’s utility in a crop rotation.</p> <p><b>Following shall be reviewed and verified:</b></p> <ul style="list-style-type: none"> <li>• The procedures that certified operations utilize to obtain and plant organic varieties suitable for their operations as part of their annual review of the OMP.</li> <li>• Review substances and inputs used to treat seeds and planting stock for compliance with the organic regulations</li> <li>• Verify the commercial availability requirements on an annual basis, in their review of the OMP.</li> <li>• Review an operation’s progress in obtaining organic seeds, planting stock and transplants by comparing current source information to previous years.</li> </ul> <p>Examples of types of treatments that should be reviewed by ZENITH: <b>(Pesticides, including fungicides, herbicides and insecticides, Pelleting, Inoculants)</b></p>		
Per NOP, At least three Organic sources must be contacted prior to using a non-organic Seed or planting stock <i>*Nonorganically produced planting stock to be used to produce a perennial crop may be sold, labeled, or represented as organically produced only after the planting stock has been maintained under a system of organic management for a period of no less than 1 year.</i> Price cannot be a consideration for determination of commercial availability. Following considerations	A documented search involving potential, known organic suppliers has to be conducted;		Per EU, Use of non-organic seeds/propagating material for more than one season shall not be allowed. *when organic plant reproductive material is justified to be not available in sufficient quality or quantity, then may use non organic or in-conversion plant reproductive material Without prejudice to relevant national rules, may use both organic and inconversion plant reproductive material obtained from their own holding (in such case, need not required to be approved under derogation). By the Way of Derogation, the following shall be allowed: a) The production of sprouted seeds, which include sprouts,

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	<p>could be acceptable to justify use of non-organic seeds and planting stock as not commercially available and shall be described in organic system plan (OSP),</p> <ul style="list-style-type: none"> <li>• <b>Form Considerations:</b></li> <li>• <b>Quality Considerations:</b></li> <li>• <b>Quantity Considerations:</b></li> </ul> <p><b>All records pertaining to seed search, purchase, use, balance must be maintained for ZENITH verification.</b>  <u>Refer NOP 5020</u> : This guidance helps operation to demonstrate their proactive efforts to procure all organic seeds, annual seedlings, and planting stock in support of their organic system plan (OSP). This guidance clarifies “equivalent variety” and also describes the form, quality, or quantity criteria that need to be met before seeds or planting stock can be categorized as commercially unavailable as organic. Further, this guidance outlines considerations regarding the inputs and substances routinely used during crop production.</p> <p>—</p>		<p>shoots and cress, solely living on the nutritional reserves available in the seeds, by moistening them in clear water, provided that the seeds are organic. The use of growing medium shall be prohibited, except the use of an inert medium intended solely to keep the seeds moist when the components of that inert medium are authorized in compliance with EU regulation</p> <p>b) the obtaining of chicory heads, including by dipping them in clear water, provided that the plant reproductive material is organic. The use of a growing medium shall be allowed only when its components are authorized in compliance with EU regulation</p>
<p>Seeds with chemical dressing</p>	<p>Seeds, annual seedlings, and planting stock treated with prohibited substances may be used to produce an organic crop when the application of the materials is a requirement of Federal or State phytosanitary regulations.</p>	<p>May be used, <u>Per authorized substances listed in CAN/CGSB-32.310-2020.</u>  <i>*Non-organic perennial planting stock treated with substances prohibited by 1.5 a, 1.5 b, 1.5 c or 1.5 d shall be managed in accordance with this standard for at least 12 months before the first harvest of organic products. The land on which non-organic stock is planted must have no usage of land prohibited input history from</i></p>	<p>Shall be treated with authorized substance as defined in regulation.</p>

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		<i>past 36 months.</i>	
Annual Seedlings	Must be Organic <i>* Nonorganically produced annual seedlings may be used to produce an organic crop when a temporary variance has been granted in accordance with § 205.290(a)(2)</i>	Must be Organic	
Crop pest(P), weed(W), and disease(D) management	<p>Must be Managed through <b>Management Practices for PWD</b> (Crop rotation, nutrient management, Sanitation measures, Cultural practices, etc) ; <b>Mechanical or physical methods for P</b> (Introduction of predators or parasites , Development of habitat for natural enemies , Non-synthetic controls such as lures, traps, and repellents, etc) and <b>weed Problems may be controlled through</b>(Plastic or other synthetic mulches, Mulching with fully biodegradable materials, Mowing , Livestock grazing, Hand weeding and mechanical cultivation, etc) Practices ; <b>Disease problem may be controlled through</b> Management practices which suppress the spread of disease organisms, Thermal Process ,Etc.</p> <p>When organic management practices alone cannot prevent PWD, then authorized Substances list need to be followed.</p>		
	<a href="#">Evaluation criteria for allowed and prohibited substances, methods, and ingredients.</a>  <a href="#">Allowed and prohibited substances, methods, and ingredients in organic production and handling.</a>  <a href="#">Materials for Organic Crop Production</a>	<a href="#">Table 4.2 (Column 1 or 2) of CAN/CGSB-32.311</a>	<a href="#">List of Authorized Substances</a>  <a href="#">Additional List, Amending to above list of Authorized Substance</a>
	<p><i>*In the event of emergency pest or disease treatment, operators are required to notify ZENITH, immediately if there is any changes in organic product certification.</i></p>		
Input Usage	<p>Farm inputs, such as fertilizers and crop protection products, need not be "certified" for being used on organic farms. All inputs intend to use require prior approval  <b>Refer ZENITH Input Evaluation Policy for detailed description.</b></p>		
Post-Harvest Handling of Organic Products	<p>Post-harvest handling includes actions such as washing, cleaning, sorting, packing, cooling, storing of raw agricultural products, and facility pest management. These actions can be performed on farms or in handling facilities.  <b>EU 852/2004</b> indicates "unprocessed products" means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed;  <b>All post harvest handling activities (Flow chart wherever needed), area/ premise use, responsibility, recordkeeping, equipment use, sanitation.</b> Applicable standard substance list must be referred for use of inputs in crop production, livestock production, processed products.</p> <p><b>For NOP: following to be referred</b></p> <ul style="list-style-type: none"> <li>• 7 CFR § 205.601 lists substances for use in crop production;</li> <li>• 7 CFR § 205.603 lists substances for use in livestock production; and</li> <li>• 7 CFR §§ 205.605 – 205.606 list substances for use in or on processed products.</li> </ul> <p>Post-harvest substances may be found in both sections 205.601 and 205.605. For example, some post-harvest handling substances, such as lignin sulfonate and sodium silicate (used as floating agents), are included in § 205.601; and others, such as ethylene (for tropical fruit ripening) and chlorine and peracetic acid (used as antimicrobials), are included in § 205.605.</p> <p><b>Steps to be followed for appropriate identification of substance in correct scope of activity:</b></p>		



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1. **A substance may be used in post-harvest handling if it falls in one of the following categories: (Note: The use of any substance must comply with the U.S. Environmental Protection Agency (EPA) or U.S. Food and Drug Administration (FDA) requirements, as applicable.)**
  - Synthetic substances that are listed in § 205.601 of the National List specifically for post-harvest use may be used for handling raw agricultural commodities, either on farms or in handling facilities. (E.g., lignin sulfonate or sodium silicate.)
  - Substances listed in § 205.605 of the National List may be used for post-harvest handling of raw agricultural commodities either on farms or in handling facilities, provided that there is no restriction limiting their use. (E.g., carbon dioxide, nitrogen gas, and ozone.)
  - Natural (nonsynthetic) substances allowed for use in crop production that are not restricted or prohibited in § 205.602 of the National List may be used for post-harvest handling of raw agricultural commodities, either on farms or in handling facilities.
2. **All inert ingredients used in post-harvest pest control substances on raw agricultural commodities must be either nonsynthetic and not prohibited in § 205.602 of the National List, or allowed by § 205.601(m) of the National List.**
3. **Facility pest management:** The USDA organic regulations also provide for the use of certain substances in facility pest management, under certain circumstances, even though they are not on the National List. Section 205.271 describes an order of preference for facility pest management practices. Producers or handlers must first apply management practices to prevent or control pests as described in § 205.271(a) and (b), including the use of lures and repellents containing nonsynthetic or synthetic substances that are consistent with the National List. If these practices are not adequate, then a nonsynthetic or synthetic substance “consistent with the National List” may be applied.

### **Example includes:**

- Materials such as pheromones, sticky traps, boric acid, and Vitamin D3 are listed in § 205.601 of the National List for use in crop production, therefore, these substances would be “consistent with the National List” for facility pest control purposes.
- If none of the practices listed in § 205.271 are effective, the handler may use substances that are not on the National List, provided that there is no contact with organic products or ingredients, the ZENITH and handler agree on the use of the substance, and its use complies with § 205.271(d). Handlers include producers who handle crops or livestock of their own production.

3.1. Producers and handlers may use nonsynthetic or synthetic substances “consistent with the National List” in facility pest management. This means that nonsynthetic substances and synthetic substances listed in §§ 205.601, 205.603 or 205.605 of the National List may be used for facility pest management in accordance with any restrictions, provided they are not included at §§ 205.602 or 205.604 of the National List as prohibited nonsynthetic substances.

3.2. Any EPA registered pesticide substance used in a facility pest application must be labeled for that use.

3.3. All inert ingredients in facility pest management products permitted under § 205.271(c) must be either nonsynthetic, included in § 205.601(m), included in § 205.603(e) of the National List, or included in § 205.605 of the National List.

3.4. Producers and handlers shall demonstrate compliance with § 205.271 in their Organic System Plans. Inspector need to verify its compliance with restrictions if any.

3.5. Producers and handlers may use substances that are not on the National List for facility pest management, provided that there is no contact with organic products or ingredients, they are used in accordance with § 205.271(d), and as agreed on conditions imposed by ZENITH on the use and method of application of the substance.

### **Note:**

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	<ul style="list-style-type: none"> <li>• All pesticides must have an EPA registration or exemption from registration for use in facility pest control.</li> <li>• Management practices must be demonstrated before the substance use.</li> <li>• Refer NOP 5023 for applicability of post harvest handling substances</li> </ul>
<p><b>Labels</b></p>	<ul style="list-style-type: none"> <li>• All Labels/tags/stickers etc must be approved from your certifier, prior to usage. <b>usage of unapproved labels may lead to Noncompliance. Refer ZENITH Labelling Policy for detailed description.</b></li> <li>• Note that <b>in case CB loss its accreditation</b>, then in such cases Operation may use Existing Labels (old CB labels) upto 60 days, then in such case New CB have to approve the use-up of existing label supplies. Operators have to submit existing label supplies inventory for approval to ZENITH , and after 60 days must not use existing labels identifying the prior certifier.</li> <li>• <b>Certified operations that change certifying agents voluntarily</b> and have labels which identify their prior certifying agent on products they produce or handle, may not use up existing supplies of labels. New labels must be used immediately identifying the new certifying agent.</li> </ul> <p><b>In case of Voluntary change of CB</b>, operator may sell certified prepackaged products labelled with the name of the previous CB as long as these products were packaged before the CB change and an inventory list was provided to both CBs(COR Specific)</p>
<p><b>Temporary Variances (NOP)</b></p>	<p>The Administrator may establish a temporary variance from the requirements in §§ 205.203 - 205.207, 205.236 - 205.240, and 205.270 - 205.272 of the regulations.</p> <p>*Temporary variances shall be granted for a specified period of time, subject to extension as the Administrator deems necessary.</p> <p><b>A temporary variance may not be granted for:</b></p> <ul style="list-style-type: none"> <li>— Any practice, material or procedure prohibited under § 205.105;</li> <li>— Feeding non-organic feed to organic livestock; or</li> <li>— Any USDA organic regulation not included in §§ 205.203 - 205.207, 205.236 - 205.240, or 205.270 - 205.272.</li> </ul> <p align="center"><b><u>Procedure to be followed:</u></b></p> <ol style="list-style-type: none"> <li>1. Submit request for a temporary variance by operator</li> <li>2. ZENITH may Accept requests for temporary variances from certified operations and within 15 working days review requests to determine whether they are based on one or more of the reasons listed in 7 C.F.R. § 205.290(a), and whether the supporting documentation provided by the operation justifies the need for the requested temporary variance. <b>The accepted reasons are:</b> <ol style="list-style-type: none"> <li>a. <b>Natural disasters declared by the Secretary;</b></li> <li>b. <b>Damage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire, or other business interruption; and</b></li> <li>c. <b>Practices used for the purpose of conducting research or trials of techniques, varieties, or ingredients used in organic production or handling.</b></li> </ol> </li> <li>3. ZENITH will submit recommendations for establishing temporary variances in writing to AMS with supporting evidence justifying the need for the temporary variance, along with the scope, duration, and any restrictions for the temporary variance.</li> <li>4. ZENITH will respect NOP decision and notify operation accordingly within 10 days of AMS decision.</li> </ol>
<p><b>Wild-crop harvesting practice</b></p>	<p>The collection of wild plants and parts thereof growing naturally in natural areas, forests and agricultural areas is considered as organic production, provided that:</p> <ul style="list-style-type: none"> <li>• For a period of at least three years before the collection, those areas were not treated with products or substances other than those authorized pursuant to § 205.105 , EU 2018/848 ,</li> </ul>

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	<p>EU 2021/1165 for use in organic production;</p> <ul style="list-style-type: none"> <li>• Specify the date of the last application on the parcels and/or collection areas concerned of products, the use of which is not compatible with the organic production rules.</li> <li>• The collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area.</li> <li>• A detailed map of the collection region must be presented; collection places and critical areas (if any) must be marked on the map, including GPS coordinates for relevant places. Indicate the storage and production premises, harvest methods and land parcels and/or collection areas and, where applicable, premises where certain processing and/or packaging operations take place</li> <li>• Operators shall keep records of the period and location of the collection, the species concerned and the quantity of wild plants collected.</li> <li>• The production zone for wild crops shall be isolated from contact with prohibited substances by a <a href="#">clearly defined buffer</a>. Harvest sites shall be located more than one kilometer (0.62 mi.) from potential sources of environmental contamination, such as golf courses, dumps, sanitary landfill sites and industrial complexes. <b>{COR additional requirement}</b></li> <li>• In case of collection of wild plants, the practical measures shall include any guarantees given by third parties (Authority in concern to Agriculture) which the operator can provide to ensure that the wild product harvested in defined wild area (Must include type of product harvested like fruits, leaves, etc.; designated area, Potential yield, Estimated harvested) and guarantee that product is harvested/collected in sustainable manner.</li> </ul>
<p><b>Cross contamination:</b></p>	<p><a href="#">NOP</a> and <a href="#">COR</a> explicitly require buffer zones between organic and conventional fields.</p> <p>EU Reg require operators to take "<a href="#">precautionary measures</a> ...in order to reduce the risk of contamination", which includes the need of separating organic from conventional fields, whenever there is a risk of pesticide drift.</p> <p><b><u>Preventive and precautionary measures:</u></b> The regulation (EU) 848/2018 highlights the importance of operators' responsibilities:</p> <p>✓ Operators should take <b>preventive measures</b> at every stage of production, preparation and distribution, where appropriate, to ensure the preservation of biodiversity and soil quality, to prevent and control pests and diseases and to avoid negative effects on the environment, animal health and plant health. They should also take, where appropriate, proportionate <b>precautionary measures</b> which are under their control to avoid contamination with products or substances that are not authorized for use in organic production in accordance with this Regulation and to avoid commingling organic, in-conversion and non-organic products.</p> <p>Refer <a href="#">Reference Guide: NOP 5020 Appendix A</a> for natural resource and biodiversity management, <b>similar method can be adopted for all standard (EU, COR)</b></p>
<p><b>Packaging and transport of products to other operators or unit</b></p>	<p>Operators shall ensure that organic products and in-conversion products are transported to other operators or units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that alteration, including substitution, of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by Union law or importing country law:</p> <p>(a) the name and address of the operator and, where different, of the owner or seller of the product;</p>

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	<p>(b) the name of the product;</p> <p>(c) the name or the code number of the control authority or control body to which the operator is subject; and</p> <p>(d) where relevant, the lot identification mark in accordance with a marking system either approved at national level or agreed with the ZENITH and which permits the linking of the lot with the records</p>
<b>Traceability</b>	<p><b>‘Traceability’</b> means the ability to trace and follow food, feed or any product, and any substance intended or expected to be incorporated into food, feed or any product, through all stages of production, preparation and distribution</p> <p><b>‘stage of production, preparation and distribution’</b> means any stage from the primary production of an organic product through its storage, processing, transport, and sale or supply to the final consumer, including, where relevant, labelling, advertising, import, export and subcontracting activities</p> <p>Traceability needs to be documented backwards, meaning that it should begin with export, proceed with processing, and end with raw material receipt.</p> <p>To verify if goods are organic or conventional, a traceability check is performed. At every stage of production, preparation, and distribution, traceability must be assured in order to maintain the integrity of organic production.</p> <p>Verification of the entire document should be done. The product must be tracked from the point of sale, via processing, storage, and finally back to the source.</p> <p>Products intended for sale must be clearly marked as either organic or non-organic at every stage of handling, from the manufacturing facility to dispatch.</p>
<b>Mass Balance</b>	<p>Forward Traceability need to be maintained in Mass Balance. i.e from Receiving of Raw material to dispatch of finished material should be recorded.</p> <p>Determining the balance between the input and output is the goal of the mass balance check, which also aims to clearly verify the volumes of organic and non-organic products.</p> <p>For a specific product and for a particular period of time, the mass balance should be done.</p>
<b>Recordkeeping System</b>	<ul style="list-style-type: none"> <li>• Records must be maintained for not less than 5 years beyond their creation.</li> <li>• Recordkeeping system must includes but are not limited to :</li> <li>• Before the first inspection takes place, the farm must present an organic management plan to ZENITH; this plan must be updated annually</li> <li>• A farm diary. Production / processing/ handling record must be kept, recording the main activities (Right from sowing until dispatch/Sale) , raw material intake to processing to sale) on each plot, area, unit, premise</li> <li>• Financial records ((e.g. purchase orders, contracts, invoices, receipts, report of commodities, settlement sheets, or sales journals)</li> <li>• Complaint log</li> <li>• Buffer harvest records – if buffer crops are used</li> <li>• Identification of product organic, in-conversion, Conventional status in all production /sale or dispatch record</li> <li>• Lot numbering system/ Use of lot numbers</li> </ul>

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	<ul style="list-style-type: none"> <li>• Seed Packets/Input Packet (Labels), Seed Search Evidence.</li> <li>• Keep records proving the need for the use of authorized products, including the date or dates on which each product was used, the name of the product, its active substances, the amount applied, location of such use, the crop and parcels concerned, and the pest or disease to be controlled</li> <li>• Keep records of any other external input used on each parcel and, where applicable, keep available documentary evidence on any derogation from production rules</li> <li>• Keep records of the period and location of the collection, the species concerned and the quantity of wild plants collected</li> </ul> <p><i>*Any processing that changes the original form of the product such as chopping, peeling, cutting, waxing, coating, drying, or combining with other ingredients is consider handling and requires a separate Handling Organic System/Management Plan.</i></p> <p><i>"A good lot numbering system is logical and can readily be decoded. For example, Lot No. OC0603 might indicate Organic Corn, from bin #06, which was harvested in 2004. Lot No. B041433 might indicate Broccoli, from field 04, harvested on the 143 (May 24), in the year 2003.</i></p>
USCOEA requirement	<p>Following Requirement must be fulfilled in order to fulfil USCOEA requirements:</p> <ul style="list-style-type: none"> <li>• Agricultural products produced with the use of sodium nitrate shall not be sold or marketed as organic in Canada.</li> <li>• Agricultural products produced by hydroponic or aeroponic production methods shall not be sold or marketed as organic in Canada.</li> <li>• Agricultural products derived from animals must be produced according to livestock stocking rates as set out in the most recent version of CAN/CGSB-32.310 and CAN/CGSB-32.310</li> </ul>
Aeroponics and Hydroponic production	<ul style="list-style-type: none"> <li>• <b>EU &amp; COR:</b> Prohibited under EU and COR</li> <li>• <b>For NOP:</b> certification of hydroponic, aquaponic, and aeroponic operations is allowed under the USDA organic regulations who Must comply with Organic Foods Production Act and the USDA organic regulations. OFPA &amp; NOP .</li> </ul> <p>Refer NOP <a href="#">Memo of June 03, 2019</a>- Certification of Organic Crop Container Systems</p> <ul style="list-style-type: none"> <li>• <b>Terms Defined :</b> <ul style="list-style-type: none"> <li>— <b>Greenhouse-</b> Enclosed structure that allows for an actively controlled environment used to grow organic crops, annual seedlings or planting stock used in organic production.</li> <li>— <b>Hydroponics-</b> The production of normally terrestrial, vascular plants in nutrient rich solutions or in an inert, porous, solid matrix bathed in nutrient rich solutions.</li> <li>— <b>Aeroponics-</b> A variation of hydroponics in which plant roots are suspended in air and misted with nutrient solution.</li> <li>— <b>Containers-</b> Any vessel and associated equipment used to house growing media and the complete root structure of terrestrial plants and to prevent the roots from contacting the soil or surface beneath the vessel, such as, but not limited to, pots, troughs, plastic bags, floor mats. etc.</li> <li>— <b>Growing media-</b> Material which contains sufficient organic matter capable of supporting the plant root system and a natural and diverse soil ecology</li> </ul> </li> </ul>
Container growing system	<p>Legal requirements related to the three-year transition period apply to all container systems built and maintained on land.</p> <p>These two questions will be assessed for <b>container systems :</b></p>

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	<ol style="list-style-type: none"><li>1. <b>Eligibility check:</b> Is the land eligible for organic production?</li><li>2. <b>Compliance check:</b> Is the system compliant with the USDA organic regulations, and can it maintain compliance?<ul style="list-style-type: none"><li>— Eligibility Consistent with the OFPA and USDA organic regulations, certifiers must confirm that organic crops have been produced and handled without the use of synthetic substances (with the noted exceptions of synthetic substances allowed for organic crop production on the National List of Allowed and Prohibited Substances); and</li><li>— must not be produced on land to which prohibited substances have been applied during the three years immediately preceding the harvest of agricultural crops.</li><li>— Shall verify Land use histories for container system sites, just as for an in-ground soil-based system.</li><li>— If a prohibited substance was applied to the land at the farm or site within the three-year period before the first organic harvest, then the harvested crops shall not be sold, labeled, or represented as “organic” until the three-year period has passed.</li><li>— If the operation documents that no prohibited substance was applied within that three-year period, then the land may be eligible for container system production, just as it would be for a soil-based system.</li><li>— <b>Examples:</b><ul style="list-style-type: none"><li>○ A container operation wishes to construct a container system on a plot of land and provides evidence that no prohibited substance has been applied within three years before the expected harvest. This land may be eligible for organic production.</li><li>○ A container operation is proposed to be constructed on land that was treated with a prohibited substance within the past year. This land would not be eligible for organic production until three years had passed between the application and projected harvest.</li><li>○ Ongoing Compliance Once certified, ZENITH shall assess container systems for ongoing compliance with the USDA organic regulations. No prohibited substances may be applied anywhere in the system, including on the land underlying the system, or in the system itself.</li><li>○ Evaluate the compliance of the overall system, including maintaining or improving natural resources, supporting nutrient cycling, promoting ecological balance, and conserving biodiversity.</li></ul></li></ul></li></ol>
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### High risk Product/ Countries (EU Programme):

*EU have defined list of high-risk products/countries. Affected operators & GoOs will need to be inspected twice a year, Even more intense sampling will be required for “high risk products” as defined by Reg. 2021/1698. Under EU Additional control measures, ZENITH will consider current and last year (Previous year) high risk product and country for further implementation.*

#### Additional References can be checked from following links:

- [https://agriculture.ec.europa.eu/system/files/2023-11/organic-rules-faqs\\_en.pdf](https://agriculture.ec.europa.eu/system/files/2023-11/organic-rules-faqs_en.pdf) (FAQ regarding the provisions of Regulation (EU) No 2018/848 and its secondary legislation
- [EU Regulation secondary acts cover organic production and labelling of organic products.](#)
- [NOP-SOE Final rule](#)
- [US-Canada Organic Equivalence Arrangement \(US-COEA\) -FAQ](#)
- [United States-Canada Organic Equivalence Arrangement \(USCOEA\) – Overview](#)
- [National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations .](#)
- [https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement/faq\(SOE FAQ\)](https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement/faq(SOE FAQ))

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- [USDA NOP Trade arrangement](#)
- [Trade arrangement and Labeling requirement](#)

*Please be aware that this is only a selection of essential requirements as an introduction. The operator, of course, has to learn about and meet all requirements of the standard ([NOP](#), [COR](#) and [EU](#)).*