

[Extracted Copy of ZENITH Guidance & Working Instruction]

Conversion rules Plant and plant products {EU 2018/848}

For plants and plant products to be considered organic, the production rules as referred to in EU 848/2018 and where applicable the exceptional production rules must have been applied on the parcels during a conversion period of at least two years before sowing, or, in the case of grassland or perennial forage, at least two years before its use as feed from organic farming, or, in the case of perennial crops other than forage, at least three years before the first harvest of organic products. Operator need to keep documentary evidence relating to the retroactive recognition granted for 3 years.

<p>Condition to consider earlier starting date of conversion period:</p>	<p>ZENITH may decide to recognize retroactively as being part of the conversion period any previous period in which:</p> <ul style="list-style-type: none"> — the parcels were natural or agricultural areas which were not treated with products not authorized for organic production. <p>The period referred above can be taken into consideration retroactively only where satisfactory proof has been furnished to ZENITH allowing it to satisfy itself that the conditions were met for a period of at least three years.</p> <p>No previous period may be retroactively recognised as being part of the conversion period, except where:</p> <ul style="list-style-type: none"> (A) the operator’s land parcels were subject to measures which were defined in a programme implemented pursuant to Regulation (EU) No 1305/2013 for the purpose of ensuring that no products or substances other than those authorised for use in organic production have been used on those land parcels; or (B) the 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 authorised for use in organic production. <p>Extension of the conversion period ZENITH reserves the right to decide to extend the conversion period, in case the soil has been chemically polluted in such quantities that this can lead to residues in the finished product (plants or animals).</p>
<p>Applicability</p>	<p>Retroactive recognition for cultivated plots/ fallow/ virgin areas may be granted for the following organic Standards:</p> <ul style="list-style-type: none"> — Regulation (EU) 2018/848 (Art. 10.3(b)) — Processing of your application will be charged according to our Fee structure.
<p><u>What must submit for Retroactive recognition</u></p>	<p><u>Following documents to be supplied in case of retroactive recognition of previous periods for the conversion to organic production:</u></p> <p>Sufficient land history documentation (proof from third party (eg. Local government) of producing according to the requirements in last 2-3 years (depends on the length of conversion period i.e. Past 36 months prohibited Input history required) issued by an independent third party. Emphasis shall be placed on the authenticity of the declarations and that as many details and specifications as possible together with exact dates, signature and stamp shall be available. The details should include:</p> <ul style="list-style-type: none"> — Designated Application Form (ZENITH Form) — (Overview Map must accompany with all production unit identification, total surface of land parcels, geological coordinates (where available) nature and volume of current production (relevant when cultivating organic production under some Govt/ non Govt Institution). This information may be attached as index to the map.

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	<ul style="list-style-type: none"> — Third party relevant Authority attestation letter (Knowledge in question like agriculture Department/ Horticulture Department or relevant field NGO, Agriculture Expert) endorsing 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 authorised for use in organic production in accordance with Regulation (EU) 2018/848. Should include last date of prohibited input use with prohibited input name, Start date of organic farming. For Grower group, list of group members with all these details of each member will be required. — Declaration from the operator or land owner that no prohibited products with specific reference to the EU 848/2018 have been applied in the period of time for which retroactive recognition is requested. — Past 03 Years Field records (In case of GG, Compiled Farmers Data is acceptable, which must include Farmer ID, Last Prohibited input usage date with input name, Crops grown with Area, Actual Production details), Nature and volume of the ongoing production — Analysis reprot: Soil/ Product/plant sample residue analysis report from NABL accredited laboratory
<p><u>Steps for Retroactive Recognition:</u></p>	<ul style="list-style-type: none"> ▪ <u>Request Made:</u> Applicant/ operator submits retroactive recognition request to ZENITH. Processing of your application will be charged according to our Fee structure. ▪ <u>Application Request review:</u> On receipt of Retroactive application, Certification specialist will review the information of each parcel request, attestation letter, analysis report. ▪ <u>Risk Assessment;</u> Analyze risk of each parcel (for GG-each member parcel) for use of forbidden input applied or treated if any during that period on each land parcel subject to the request. Instruct sampling to inspector (add notes to inspector in Preliminary Compliance Review) when any land parcel identified as presenting the risk of being contaminated as a result of being treated with products and substances that are not authorized for use in organic production. ▪ <u>Audit scheduling:</u> Plan and conduct physical inspection with sampling(when required for specific parcel), present inspection report with detailed information pertaining to consistency of the information collected on the land parcels covered by the request for retroactive recognition. ▪ <u>Onsite Inspection:</u> <ul style="list-style-type: none"> — Physical inspection of the whole growing season of the product: only if a project is inspected from the start of the growing season it will be possible to sell products with organic status in the first year of inspection. — Furthermore, zenith demands that, before taking decision about the retrospective consideration of the conversion period, samples are being analyzed for residues of disallowed products at the expense of client. ▪ <u>Certification decision:</u> A final written statement of certification decision will indicate following: <ul style="list-style-type: none"> — whether a retroactive recognition of a previous period as being part of the conversion period is justified and — indicate the starting period considered as organic for each land parcel concerned as well as; — the total surface of the land parcels benefiting from a retroactive recognition of a period.