

[Extracted Copy of ZENITH Quality Manual and Procedure Manual]

System for maintenance of certification:

Continuation of Certification Procedure (Renewal of the Certification):

1. **Three (3) months** prior to the anniversary date of the Certificate, ZENITH will send a Renewal Package. If the operation does not submit an annual update to its certifier, then it is in violation of standard. To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to ZENITH.
 - A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the organic system plan, submitted during the previous year. ZENITH provides an Annual Update Form to facilitate this process.
 - Any additions to or deletions to the previous year's organic system plan, intended to be undertaken in the coming year.
 - Any additions to or deletions related to the name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf.
 - Certification Fee at least once per year to continue its organic certification
 - Other information as deemed necessary by ZENITH to determine compliance with the regulations.

If an operation fails to submit an annual update prior to the onsite inspection, then a Notice of Noncompliance will be issued.

Notification of Changes: The operation is to notify its certifier prior to making any changes to its OSP that may affect its compliance with the regulations. It must demonstrate compliance with the regulations, but does not need to report any changes that do not affect its compliance. Some examples of situations that would require notification to the certifier include:

- Application of a prohibited substance to any field, production unit, product or site involved in organic production or handling, regardless of whether it was a direct application or drift from a neighboring area, and regardless of whether or not it was intentional. The operation must notify the certifier immediately of any such events;
 - Addition of acreage, a new field, product line, production facility, animal herd, or animal facility to organic production;
 - Removal of a field or portion thereof from organic production;
 - Development of a new retail label for the operation's organic products;
 - New processing or handling of organic products not already specified in the OSP; and
 - Any change in the operation's practice, input, or procedure that may affect compliance with the regulations.
2. If the operation plans to add a new field, facility, production line, unique production

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equipment, animal herd/species, or animal facility to its certification, then ZENITH will conduct an additional inspection before issuing an updated certificate (Renewal Certificate). If the operation sells, labels, or represents products from fields or facilities that have not been inspected and that are not included on the certificate, then the operation is in violation of standards and certification requirement. Similarly, any new retail labels developed for the operation's organic products must be approved by ZENITH before being used. An operation should consult ZENITH prior to using any new input in order to ensure that the material complies with the regulations. **The use of an unapproved material may be considered an application of a prohibited substance, which would remove the operation's land from certification for three years.** Operations must also notify of any ongoing changes that may affect its compliance with the regulations. If an operation plans to add new products, fields, operations, or labels to its OSP, then the ZENITH will first approve these changes and issue an updated certificate.

3. Operations must also notify its certifier of any ongoing changes that may affect its compliance with the regulations. If an operation plans to add new products, fields, operations, or labels to its OSP, then the certifier must first approve these changes and issue an updated certificate. A request to add new fields, animal species, or facilities would require an additional onsite inspection.
4. The operation may notify ZENITH of changes both verbally and in writing. ZENITH will document all notifications in client file so that the information may be reviewed and verified as part of the annual certification process. If necessary, ZENITH may require the operation to submit additional documentation at the time of notification. Alternatively, the operation may submit documentation with the next annual update. ZENITH will determine whether and when documentation is required on a case by case basis.

Following receipt of the information, ZENITH shall notify the operator of the results of the initial review, an estimate of the total cost of certification and the name of the inspector assigned. ZENITH will follow entire steps from initial review to certification decision step. Upon successful review, inspection, certification review in compliant to the applicable scope and standards, **ZENITH will decide for extension, renewal and updating certification, including certification of individual products.**

The certifier shall inspect the operation at least once per calendar year to determine whether its certification should continue. If an operation fails to submit an annual update prior to the onsite inspection, the certifier should issue a Notice of Noncompliance. However, the failure of an operation to submit an annual update does not relieve the certifier of its obligation to conduct an annual inspection.

After the inspection is complete, and the certifier has reviewed both the annual update and the inspection report, the certifier chooses one of the four certification decisions below and communicates this decision in writing to the operation. As with the initial certification decision, the decision to continue certification may include new conditions for minor, non-violative issues. However, if an operation shows evidence of a repeated minor issue, the certifier should elevate the violation to a Notice of Noncompliance.

The four certification decisions are:

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1. **Continuation of certification**, if the operation is fully compliant, including the issuance of a new certificate
 2. **Certification with conditions**, if there are minor, non-repetitive, non-violative issues;
 3. **Notice of Noncompliance for correctable violations**. A Notice of Noncompliance allows the operation to submit a response with proposed corrective actions, typically within 30 days of the date of issuance. The certifier must evaluate the corrective actions to determine whether the operation complies with the regulations. If the operation appears to comply, then the certifier should recommend certification or certification with conditions. If the operation does not appear to comply, then the certifier should proceed to a Notice of Proposed Suspension or revocation of certification; and
 4. **Combined Notice of Noncompliance and Proposed Suspension or Revocation for non-correctable violations**, including willful or fraudulent violations
- The final review of the inspection report and the certification decision steps may be performed by the same person, but that person may not be the inspector.
 - The certifier may conduct additional onsite inspections to verify continued compliance with the regulations. These inspections may be announced or unannounced, as deemed appropriate by the certifier.

ZENITH offers scope extension and reduction services for certified operators.

- **Surveillance:**
ZENITH will monitor products that indicate “Certified by ZENITH” to confirm that they conform to the standards. ZENITH may conduct such surveillance at trade shows and other locations where products may be displayed or sold. A record of the noncompliant surveillance activities will include the date, event, location, name of staff person, and description of products. These records will be filed at the ZENITH office.
- **Accessibility**
In exceptional cases, the Zenith can decline an application or extension of certification on the basis of substantiated reasons. The decision shall be recorded and the applicant shall be informed of the reasons for denial and of his right to appeal.