

EU Certification Program

欧盟有机认证方案

1. Purpose 目的

This policy governs how SRS Certification GmbH (hereinafter referred to as 'SRS') implements requirements imposed on Third Country control bodies which are approved to apply Reg. (EU) 218/848. Article 46 of that regulation lists preconditions for approval by the EU Commission as control body. The present policy explains how SRS will apply implementing acts and delegated acts in order to comply with rules on reporting, exchange of information and publication of information set by the EU Commission as well as management of the granting of derogations based on Reg. (EU) 2021/1698.

本政策规范SRS认证有限责任公司（以下简称“SRS”）如何实施对经批准适用第(EU) 2018/848号条例的第三国控制机构所施加的要求。该条例第46条列出了欧盟委员会作为控制机构批准的前提条件。本政策说明SRS将如何适用实施条例及授权条例，以遵守欧盟委员会关于报告、信息交换及信息公开的规定，并依据第(EU) 2021/1698号条例管理特许豁免事宜。

Furthermore, this policy details how to meet requirements of ISO/IEC 17065:2012 on publication of information, e.g. making publicly available the list of countries and product categories for which SRS has been recognized by the EU Commission and the list of products of Annex I of Reg. (EU) 2018/848.

此外，本政策详细阐述了如何满足ISO/IEC 17065:2012关于信息公开的要求，例如公开欧盟委员会认可SRS的国家及产品类别清单，以及第(EU) 2018/848号条例附录一的产品清单。

2. Scope 范围

This policy applies to organic certification according to Reg. (EU) 2018/848, to all scopes and countries SRS is approved for by the EU Commission.

本政策适用于根据条例（EU）2018/848进行的有机认证，涵盖欧盟委员会批准的所有适用范围及国家。

3. Compliance with 2018/848, Article 46(2) 遵守条例2018/848 第46条 第2款

SRS works in compliance with the standard ISO/IEC 17065 and continues to maintain its accreditation by the German accreditation body DAkkS. The accreditation serves as a guarantee of fulfilling Article 46(2) points (a) – (k), (n) & (o) of Reg. (EU) 2018/848.

SRS依照ISO/IEC 17065标准运作，并持续保持由德国认可委DAkkS的认可。该认可证实SRS符合条例（EU）2018/848第46条第2款（a）至（k）、（n）及（o）项的要求。

3.1 Annual reporting 年度报告

By 28 February of every year SRS submits an annual report to the EU Commission¹. The report sets out the activities of SRS in the previous year and updates as detailed in Reg. (EU) 2021/1698 Annex II:

SRS每年2月28日前向欧盟委员会提交年度报告¹。该报告说明SRS上一年度的工作活动，并依据条例（EU）2021/1698 附录二的详细要求进行更新

- Update of the technical dossier
技术档案更新
- Update on information of SRS (address, contact data, website link, etc.)
SRS信息更新（地址、联系方式、网站链接等）
- Annual assessment report of accreditation body DAkkS
认证机构 DAkkS 的年度评估报告
- Number of operators under control by country and category of products
按国家和产品类别划分的认证操作者数量
- Number of samples taken
抽样数量
- Number of inspections
检查次数
- Number of non-compliances found (minor, major, critical)
发现的不合规数量（轻微、重大、关键）
- Information on operators who changed the CB
转机构的操作者信息
- Information on operators with high-risk products
高风险产品的操作者信息
- Authorisations for use of non-organic plant reproductive material.
非有机植物繁殖材料使用授权

¹ Reg. (EU) 2021/1698, Art.4; Art.25 & 26

The annual report is submitted in English using OFIS².
年度报告用英文撰写并通过OFIS²提交。

3.2 Exchange of information – OFIS

信息交换-OFIS

The Organic Farming Information System OFIS shall be used for exchange of information with the EU Commission, other certification bodies (CBs), competent authorities of the Member States and of concerned third countries³.

有机农业信息系统 OFIS 应用于与欧盟委员会、其他认证机构、成员国主管当局及相关第三国主管当局之间的信息交换³。

OFIS shall be used for communication on the following:

OFIS 应用于以下交流:

- Notifications by SRS of suspicions of non-compliances
SRS 就疑似不合规事项的通知
- Answering of notifications on suspected or established non-compliances
对疑似或确认不合规通知的回复
- Derogations granted because of catastrophic circumstances
因灾难性情况授予的例外许可
- Authorisations for use of non-organic agricultural ingredients.
非有机农业成分的使用授权。

Any suspicion of non-compliances that affects the integrity of organic or in-conversion products shall be communicated by SRS immediately (within maximum one working day). Where SRS receives a notification as regards suspected or established non-compliance affecting the integrity of imported organic or in-conversion products an investigation (see below) shall be carried out. The reply shall be submitted within 30 calendar days including the results of the investigation, actions and measures taken as well as any other information if required by the notifying Member State or deemed necessary by SRS⁴.

任何影响有机产品或转换产品完整性的违规怀疑，应由SRS立即通报（最长不超过1个工作日）。当SRS收到关于影响进口有机产品或转换产品完整性的疑似或已确立不合规的通知时，应进行调查（见下文）。回复应在30个日历日内提交，包括调查结果、采取的行动和措施，以及通知成员国要求或SRS⁴认为必要的任何其他信息。

4. Investigations in case of (suspected) non-compliance⁵

对不合规（疑似）的调查⁵

² OFIS = Organic Farming Information System 有机农业信息系统

³ Reg. (EU) 2021/1698, Art. 20

⁴ Reg. (EU) 2021/1698, Art. 21

⁵ Detailed in Reg. (EU) 2021/279, Art. 2

Where SRS suspects or receives substantiated information (e.g. from a certified operator, other CBs, via OFIS) that a product from organic production is intended to be imported to the EU that may not be in compliance with Reg. (EU) 2018/848 because of the presence of non-authorized substances an investigation shall be carried out. The investigation aims at determining the source and the cause in order to verify compliance. It shall be completed as soon as possible (whenever possible within about 10 working days maximum) taking into account the durability of the product and the complexity of the case.

当SRS怀疑或收到确凿信息（例如来自经认证操作者、其他认证机构、通过OFIS）表明有机生产的产品计划进口至欧盟，可能因存在未授权物质而不符合Reg. (EU) 2018/848时，应进行调查。调查旨在确定来源及原因，以核实合规性。应尽快完成（在可能的情况下，最长不超过约10个工作日），同时考虑产品的耐久性及其案件的复杂性。

The investigation shall determine at least the following (supported by records):
调查应至少确定以下内容（并有记录支持）：

- name, lot identification, ownership and physical location of the products concerned
涉及产品的名称、批次识别、所有权及其实际存放位置
- whether the products concerned are still placed on the market as organic or in- conversion products or used in organic production
相关产品是否仍作为有机产品或转换产品投放市场，或用于有机生产
- type, name, quantity, and other relevant information on the present non-authorized products/ substances
当前未经授权产品/物质的类型、名称、数量及其他相关信息
- at which stage of production/processing/storage/distribution and where exactly the presence of non-authorized products/substances has been detected including, for plant products, whether the sample was taken pre-harvest or post-harvest
在生产/加工/储存/分销的哪个阶段及具体位置检测到未经授权产品/物质的存在，包括植物产品样本是在收获前采集还是收获后采集
- whether other operators in the supply chain are affected
供应链中的其他经营者是否受到影响
- results of previous official investigations on the products and operators

concerned.

此前对相关产品及操作者进行的官方调查结果

The investigation shall include the following methods and techniques⁶:

调查应包括以下方法和技术⁶:

- **examination of the controls that the operator put in place and their results**
对操作者采取的控制措施及其结果进行检查
- **on-site inspection of the production unit(s) and its surroundings including equipment, means of transport, cleaning and maintenance, hygiene practices and conditions, good farming practices, examination of documents (e.g. traceability records),**
对生产单位及其周边环境进行现场检查，包括设备、运输工具、清洁与维护、卫生操作与状况、良好农业规范、文件审核（例如可追溯性记录）
- **interview with operators and their staff**
对操作员及其工作人员进行面谈
- **sampling and testing**
采样与检测
- **additional controls for an appropriate period**
持续适当期限内的额外控制措施
- **detention of the respective product, i.e. its import shall be prohibited pending the results of the investigation.**
扣押相关产品，即在调查结果出炉前禁止其进口。

The investigation shall at least conclude on (supported by records):

调查至少应得出以下结论（并有记录支持）

- **the integrity of the organic/in-conversion product(s)**
有机/转换产品的完整性
- **the source and cause of the presence of non-authorized products/substances including if the operator himself/herself used non-authorized products/substances**
非授权产品/物质存在的来源及原因，包括经营者本人是否使用了非授权产品/物质
- **if the operator has taken precautionary measures to avoid contamination with non-authorized products/substances**
操作者是否采取了预防措施以避免非授权产品/物质的污染
- **if the operator has taken measures in response to relevant previous**

⁶ Detailed in Reg. (EU) 2017/625, Art. 14 and Art. 137(3)

requests from SRS.

操作者是否针对SRS之前的相关请求采取了相应措施SRS。

In the event that the investigation does not show any non-compliance affecting the integrity of the organic or in-conversion product, it does not lose its organic (in-conversion) status. The product shall however, not be labelled, advertised and marketed as organic (in-conversion) where the result of the investigation shows that the operator concerned:

如果调查未显示任何影响有机或转换中产品完整性的违规行为，该产品不会失去其有机/转换状态。然而，若调查结果显示相关经营者存在以下情况，产品不得以有机/转换状态进行标注、宣传或销售：

- has used non-authorized products/substances
使用了非授权产品/物质
- has not taken precautionary measures to avoid contamination with non-authorized products/substances
未采取预防措施以避免非授权产品/物质的污染
- has not taken measures in response to relevant previous requests from SRS.
未针对SRS之前的相关请求采取措施。

Where the non-compliance is established SRS determines its origin and extent and establishes the responsibilities of the operator and decides on further measures where applicable.

经确认存在不合规情况后，SRS应确定其原因和范围，明确操作者的责任，并在适用情况下决定采取进一步措施。

SRS shall give the operator an opportunity to comment within a set deadline before taking the provisional decision to prohibit the import and also on the results of the investigation.

SRS应在作出暂定禁止进口决定之前，给予操作者在规定期限内陈述意见的机会，并对调查结果提供陈述机会。

The results of the investigation are documented in writing and shall include all related records as well as records of the information exchanged with the competent authority, other certification bodies and the EU Commission.

调查结果应以书面形式记录，包含所有相关资料，以及与主管机关、其他认证机构和欧盟委员会之间交换的信息记录。

5. Authorisation for use on non-organic agricultural ingredients⁷ 授权使用非有机农业原料⁷

SRS may grant provisional authorisations for the use of non-organic agricultural ingredients for processed organic food to operators that request such an authorisation. An authorisation is granted only where it is necessary to ensure access to certain agricultural ingredients, and where such ingredients are not available in organic form in sufficient quantity. It is granted for a maximum of six months and may be prolonged for a maximum of two times six months each.

SRS可向申请操作者授予使用非有机农业原料加工有机食品的临时授权。仅在确保某些农业原料是必要的，且该等原料以有机形式无法以充足数量获得时方予以授权。授权的最长期限为6个月，并可延长最多两次，每次6个月。

SRS shall immediately notify using OFIS the EU Commission, the Member States, accreditation bodies and other control bodies recognized for third countries of any authorisation granted. The notification shall include the justification, presented in the dedicated form made available by EU Commission, that such authorisation has been granted in accordance with Article 25(1) of Reg. (EU) 2018/848.

SRS应通过OFIS立即通知欧盟委员会、成员国、认可的认证机构及第三国认可的其他控制机构所授予的任何授权。通知应包含依据欧盟委员会提供的专用表格所陈述的理由，证明该授权已依据欧盟条例(EU) 2018/848第25条第1款规定授予。

6. Authorisation for use of non-organic plant reproductive material⁸ 授权使用非有机植物繁殖材料⁸

The rules for SRS to grant authorisation for the use of non-organic plant reproductive material are established in **ORG-Pol5 Seeds and Planting Material**. In any case, before granting an authorisation, will SRS collect and assesses the following:

SRS授予操作者使用非有机植物繁殖材料授权的规则见ORG-Pol5《种子及繁殖材料》。无论如何，SRS应在授权前须收集并评估以下内容：

- scientific and common name of the crop
作物的学名及通用名称
- variety 品种
- total area to be planted and respective weight of seed or number of plants concerned 拟种植的总面积及相应种子重量或植物数量

⁷ Reg. (EU) 2021/1698, Art. 27 and Reg.(EU) 2018/848, Art. 25(1) and (4)

⁸ Reg. (EU) 2021/169,8 Art.28 & 29

- availability of organic or in-conversion plant reproductive material
有机或转换期植物繁殖材料的可用性
- documentation/statement from the operator proving that organic plant reproductive material is not available in sufficient quantity or quality in the territory of the country.
操作者出具的证明文件或声明，证明在该国境内有机植物繁殖材料数量或品质不足。

SRS draws up a justification for each derogation granted using **ORG-F1.7**

Conventional Seed & Planting Material Application.

SRS使用表格**ORG-F1.7《常规种子与繁殖材料申请》**为每项批准放宽规定编制理由说明。

7. Derogations granted because of catastrophic circumstances **因灾难授予的豁免情形**

The rules for SRS to grant derogations because of catastrophic circumstances⁸ are explained in **ORG-Pol8 Catastrophic Circumstances**. SRS notifies the EU Commission, the Member States, and accreditation bodies of such derogation via OFIS providing the following information:

关于因灾难性情况授予例外的SRS规则详见ORG-Pol8灾难性情况。SRS通过OFIS向欧盟委员会、成员国及认可机构通报该例外，并提供以下信息：

- name of the operator(s)
操作者名称
- time period for the derogation
豁免期
- type of production and/or affected plots
生产类型和/或受影响的地块
- justification for the derogation
豁免理由
- statement for the relevant authority of the third country or, if not available, justification of the non-inclusion of such a statement and the relevant dates on which recognition is based.
第三国相关主管当局声明，或如无此声明，则说明未包含该声明的理由及基于该声明认可的相关日期。

8. Publication of information on SRS website

在SRS网站上公示信息

SRS must publish on its website its latest accreditation certificate⁹ (a link to DAkkS website is possible) as well as a list of certified (groups of) operators including the following information for each operator:

SRS必须应在官网上公布最新的认可证书⁹（可提供指向DAkkS网站的链接），以及经认证的（操作者）团体名单，其中包含每个经营者的以下信息：

- name and address
名称和地址
- number of group members for groups of operators
操作者团体成员数量
- certificate number
证书编号
- category of products covered by the certification
认证涵盖的产品类别
- status and validity of the certification including cases of scope reduction, suspension and withdrawal.
认证状态及有效期，包括范围缩减、暂停及撤销的情况。

The list of operators must be updated immediately (within three working days) after any change of the status of certification. Withdrawals (revocations) must be kept in the list for 5 years after the withdrawal.

当认证状态发生任何变更后，应在3个工作日内更新操作者清单。撤销（吊销）应自撤销之日起在名单中保留5年。

Furthermore, the following information is published:

此外，应公布以下信息：

- extract of Commission Implementing Regulation (EU) 2021/1378 Annex II that refers to SRS (countries and product categories)
欧盟委员会实施条例（EU）2021/1378 附录二，涉及SRS（国家及产品类别）
- list of those products listed in Annex I Regulation (EU) 2018/848 for which certification is offered as detailed in **S14-Pol3.2 EU Annex I Products**.
（EU）2018/848条例附录一中列出的可认证产品清单，详见**S14-**

⁹ Reg. (EU) 2021/1698, Art.17

Pol3.2 欧盟附录一 产品。**9. Miscellaneous 其他**

Application documents for requests of recognition be the EU Commission as well as annual reports shall be kept 5 years following the year in which they were submitted.

提交给欧盟委员会的认可申请文件及年度报告应自提交之年起保存5年。

Changes to the content of SRS technical dossier shall be reported to the EU Commission within 30 calendar days.

SRS技术档案内容的变更应在30个日历日内向欧盟委员会报告。