GENERAL CONDITIONS FOR THE NATRUE CERTIFICATION OR APPROVAL

REG COSM 005

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INTRODUCTION

The Reg CE 1223/2009 establishes the standards for producing and commercializing cosmetics. ECOGRUPPO ITALIA S.r.l., hereinafter referred to as CB, is a control and certification body that works according to the general standards of the rules UNI CEI EN ISO 17065 and that issues the certification according to the standard NATRUE.

This Regulation establishes the relationship between the CB and the operators interested in obtaining the NATRUE certification or approval.

OBJECT

The object of this Regulation is disciplining the control and certification activity on the operators asking for the inclusion in the control system of the CB, in order to obtain the relevant certification. This Regulation particularly describes the procedures the Operators must follow in order to obtain access to and remain in the control system.

Control system procedures adopted by the CB will be explained in the following articles of this Regulation.

REFERENCE DOCUMENTS

- Standard NATRUE;
- Reg CE 1223/2009;
- UNI CEI EN ISO 17065.

REFERENCE LANGUAGE

Italian is the official language used for the documents. If necessary, the CB will issue bilingual version (Italian-English) of the documents.

Art. 1 APPLICATION FIELD AND DEFINITIONS

The law describes cosmetics as "substances or preparations, different from medicines, designate for application on external surfaces of the human body (epidermis, piliferous system and hair, nails, lips, external genital organs), or on teeth and on the mouth mucosa with the sole or prevailing aim of cleaning, scenting, changing their appearance and/or correcting the body smells and/or protecting or maintaining them in good conditions".

Cosmetics don't have therapeutic aims and they can't claim therapeutic activities.

Specific legal provisions and good manufacturing practices regulate cosmetics production. The requirements for the NATRUE certification or approval come on top of these provisions, without replacing them. For this reason, the full conformity to all these provisions is a necessary, preparatory and unavoidable condition for the producer.

According to the NATRUE Standard, certification can be requested for the following products:

- Raw materials;
- Cosmetics.

And approval can be requested for:

- Formulas;
- Raw materials.

Definitions

"Approval": refers to the process aimed at verifying compliance to the NATRUE standard by documentation review and on-site audit (where applicable) performed by a CB. Approval scheme can be applied to formulas or raw materials.

"CB": Control and Certification body which is appointed to perform certification and approval activities aimed at verifying compliance to the NATRUE Standard.

"Certificate": a document attesting the compliance of a product (raw material, cosmetics, formula) to the particular requirements the standard imposes.

"Certification": refers to the two-step process aimed at verifying compliance to the NATRUE Standard by documentation review and production site audit by a CB.

"Approval of Formulas": It is the process intended for third-party manufacturers who wish to sell their formulas to brand owners so they can use them under their own brand (B2B, no marketing at this stage).

"NATRUE approved item list": a document that lists the formulas or raw materials approved through a documentary check process.

"Operator": company, society, organization with its own functions and administration asking for certification or approval.

"Pre-Certificate": a document attesting the compliance of a product (raw material, cosmetics) to the particular requirements the standard imposes and based on an only document check. This document is valid for 6 months and it will be replaced with the "certificate".

"Products": raw materials or finished cosmetics object of certification or approval.

"Standard NATRUE": a set of information the operator has to refer to in order to obtain the "NATRUE" certification or approval

Art. 2 PROCEDURES TO OBTAIN ACCESS TO THE CONTROL AND CERTIFICATION SYSTEM

The operator willing to apply for certification or approval submits to the CB head office the Form Certification Documents Request (MD COSM 018). The form is published on the web site www.ecogruppoitalia.it, or it can be requested at the head office.

The CB receives the application of the Operator and sends him the standard NATRUE in force and the preliminary documents, that is the Notification form (MD COSM 023), the Confidentiality agreement (MD COSM 021), the General conditions for the NATRUE certification or approval (REG COSM 005), the Service contract (MD COSM 024) and the Economic offer (MD COSM 029).

The above documents have to be sent to the CB with company stamp and original signature, together with a copy of a valid identity card of the signatory. The Notification in single copy, the other documents in double copy.

A copy of these documents is registered in the file created for every Operator; the other copy is sent back countersigned by the Sole Manager.

Then the CB requests the documents that the Operator has to submit:

a) Operators certifying raw materials and/or cosmetics

- Product's technical form (MD COSM 026)
- Material safety data sheet and Technical sheet of all raw materials
- Raw material Documentation File (RMDF) for every raw material/ingredient
- Certificate of Conformity for the raw materials/products certified
- GMO Declaration
- ISO 9235 declaration for natural fragrance
- Documents about packaging (eg. Designs and technical sheet)
- Planimetry of the company installations and a copy of their sanitary authorization and of their suitability/safety certificates
- Detailed description of the equipments used
- Company organization chart
- Risk management plan

b) Operators requesting formula or raw materials approval

- Product's technical form (MD COSM 026)
- Raw material Documentation File (RMDF) for every raw material/ingredient

- Technical and safety form of the raw materials/ingredients

If raw materials or finish products are already Natrue approved or certified by another CB, only their certificate is required.

As part of the preliminary documental evaluation, the sector manager:

- Fills in the Form for documentary control (MD COSM 028), so as to check if the operator's document set is complete.
- Informs the accreditation body if the operator's headquarters is based on a country not included yet in the geographical scope of Ecogruppo Italia.

Art. 3 REMOTE DOCUMENTATION REVIEW

The control is documentation-based for companies requesting the approval of:

- Formula
- Non-organic raw materials
- Organic raw materials falling under the scope of a Regulation or Standard listed in the IFOAM Family of Standards with further processing, if the latter falls out of scope. In this case, CB shall perform a documentation check plus an on-site inspection in the first year of approval.

Followed by the evaluation of the conformity to the standard NATRUE and by the issue of the certificate. Moreover, every two years, in order to obtain the renewal of the approval, the Operator must send:

- A declaration stating that suppliers, ingredients and processes concerning the above-mentioned formulas/raw materials have not changed;

Art. 4 CONTROL ACTIVITY

A full control (desk and on-site audit) is mandatory for:

- Certification of finished cosmetics;
- Certification of ORGANIC raw materials not falling under the scope of a Regulation or Standard listed in the IFOAM Family of Standards

The control activity of the CB implies inspections at the production units the Operator has notified and documentary controls carried out at the offices. For the inspection activity the CB employs qualified inspectors ensuring the principles of competence, professionalism, impartiality and independence.

Each production unit should be controlled; however, there could be specific provisions in case of notification of numerous production units, particularly:

- Operator with different production units concerning one product P1.

Product P1 can be produced in unit A as well as in unit B. Unit A and B can be owned by the Operator or owned by a subcontractor of the company. If unit A has already been successfully controlled and if the quality management system of the producing company is also able to present for unit B tangible documents proving that the production process and the product quality are well controlled, the production procedures have been successfully checked by the CB, unit B does not necessarily have to undergo an additional control. The final decision is to be made by the Cosmetics Office and it is based on the documents received.

- Operator with different production units concerning different products P1 and P2.

Unit A and B can be owned by the Operator or owned by a subcontractor of the company. If unit A has already been successfully controlled and if the quality management system of the producing company is also able to present for unit B tangible documents proving that the production process and the product quality are well controlled, the production procedures have been successfully checked by the CB, unit B does not necessarily have to undergo an additional control. The final decision is to be made by the Cosmetics Office and it is based on the documents received.

- Operator with different units for different production steps concerning one product P1.

Unit A and B can be owned by the Operator or owned by a subcontractor of the company. For product P1, the first production step takes place in unit A and the second production step in unit B. If one of the units has already been successfully controlled and if the CB is provided with the information/confirmation from the quality management system that the production processes are equivalently managed and controlled in both units. The second unit concerned does not necessarily have to undergo an additional control. The final decision is to be made by the Cosmetics Office and it is based on the documents received.
In the above-mentioned cases, and in turn, all production units will be visited and inspected within certification cycles (i.e. audit at site A on the first cycle, audit at site B on the second cycle, etc.).

As for the above situations, the number of controls provided, is specified in the economic offer form (MD COSM 029) sent to the Operator together with the first preliminary documents.

The control of the production units takes place twice a year, if during this period no new products to certify have been added; otherwise, if the new products to certify are added after one year from the previous control, a second control inspection is necessary.

The number of controls can change according to the firm risk level, which is based on number of production units, number of products to certify, presence of parallel production. For high-risk operators, one or more controls over the certification cycle may be unannounced.
Moreover, operators to whom severe NC, as infractions, have been found, may be subject to further audits to verify the effective implementation of corrective actions.

The number of two-year controls is based on the company type, and is determined by the sum of factor "A" (number of products certified), factor "B" (number of sites to be controlled) and C (parallel production), as reported in the following table:

COMPANY TYPE	A			B				C
	from 1 to 25	from 26 to 50	> 50	1	2	From 3 to 5	>5	Parallel production
Trader	0	0	0	1	2	3	4	0
Production Company	0	1	1	1	2	3	4	1

4.1 Number of controls in two years= A+B+C

The number of planned controls is specified within the offer form (MD COSM 029) sent to the operator together with the preliminary documents. In case of changes in the starting conditions (eg. number of production units, quantity of certified references, etc.) the CB will send a new updated economic offer.

4.2 First inspection – Starting stage:

The starting stage is the preliminary act for the evaluation of the Operator's eligibility to access the control and certification system of the CB. The aims of the starting stage are: acknowledge the existence of a company organization, check conformity between real operations and submitted documents and check overall conformity to the standard NATRUE.

The first inspection takes place within 6 months from the issue of the pre-certificate.

The operator or his/her delegated deputy accompanies the inspector during the on-site inspection. A written delegation is not requested if the responsible for the company management is an employee of the controlled Operator. In this case copying the personal data of the responsible on the inspection report, specifying his position inside the company, is sufficient.

The following aspects will be controlled:

- The processing installations and the storage rooms for raw materials, semi-finished products and finished products;

In case of Operators producing both "in conformity with the standard NATRUE" and "in conventional", the inspector checks:

- If the separation of the production cycles (physical or time-wise) is possible;
- The equipment cleaning procedure before any processing of certified product;
- The physical separation of the storage rooms for raw materials, semi-finished products and finished products.

The inspector has the power to take samples for analysis.

At the end of the inspection the inspector prepares a report, inspection form (MD COSM 027), writing down findings and observations relevant to the respect of the Standard. The applicant or the responsible for the company management with a specific delegation must sign the inspection report. The inspector consigns a copy of the inspection report.

If the inspector notices some non-conformities, he shall classify them according to the Procedure of infliction and application of the sanctions (PRQ COSM 005), and he shall write them in the Non-Conformity Report (MD COSM 012).

Observations and recommendations, if any, shall be written on the control outcome letter.

4.3 Inspections following the starting stage - Surveillance:

The aim of the surveillance inspections is to verify the correct and continuous application of the standard NATRUE.

The inspections, planned by the CB according to an annual control plan, will be executed periodically and without advanced notice.

The operator or his/her delegated deputy accompanies the inspector during the on-site inspection. A written delegation is not requested if the responsible for the company management is an employee of the controlled Operator. In this case copying the personal data of the responsible on the inspection report, specifying his position inside the company, is sufficient.

Besides what is checked during the first inspection, the following aspects will be controlled:

- The tax documents of the raw materials suppliers and their certifications, as well as the correctness of the records on the In-Out register (MD COSM 006);
- The records on the Production Form (MD COSM 005), in order to control the quantity of products obtained in the different processing cycles;
- The tax documents concerning the products sold, as well as the correctness of the records on the In-Out register (MD COSM 006);
- The correct use of the NATRUE logo.

The inspector can take samples for analysis.

The quota of samples that has to be analyzed is consigned to the chosen laboratory, together with the "Form of sample delivery" (MD COSM 016) where the type of analysis requested is specified (according to the nomenclatures the laboratory adopts).

At the end of the inspection the inspector prepares a report, inspection form (MD COSM 027), writing down findings and observations relevant to the respect of the Standard. The applicant or the responsible for the company management with a specific delegation must sign the inspection report. The inspector consigns a copy of the inspection report.

If the inspector notices some non-conformities, he shall classify them according to the Procedure of infliction and application of the sanctions (PRQ COSM 005), and he shall write them in the Non-Conformity Report (MD COSM 012).

The inspectors send the dossier back to the Cosmetics Office.

4.4 Other controls:

Beyond the inspection activity at the Operators, the documentary controls represent another control system.

The CB can request, for its activity, documentary evidence concerning:

- Finished cosmetics, raw materials and all other used means of production (delivery documents, invoices, certifications, etc.);
- Management of the records concerning executed production processes (registers and other documents of the quality system);
- Finished products sales (delivery documents, invoices, etc).

The documentary control is part of the control activity of the CB. For this reason, a spotted anomaly may trigger a non-conformity. This non-conformity must be managed within the sanctions system.
The documentary controls are provided even in case of renewal of the certification. The certification NATRUE is intended as a two years certification, but in absence of a formal communication of the Operator it is automatically renewed.
The CB reports to the Operators the activity of revaluation, due to changes of the regulation or of the conditions of certification or in case of check of the closure of all non-conformities.
In case of unchanged conditions, for the renewal the Operator shouldn't send all documents already delivered, but a declaration reporting that suppliers, ingredients and internal processes concerning the raw materials aren't changed.
If, on the other hand, there are conditions that have changed (revision of the standard, formulas, production site, etc.) the CB will re-evaluate these to verify compliance with the current standard. In addition, the CB shall assess the risk level resulting from the changed conditions.

Art. 5 OPERATOR'S DUTIES

The Operator engages himself to give the CB full assistance to carry out a valid control of his own activity. He particularly will have to communicate to the CB:

- any change in the information concerning his production activity (including phone and post address) within 30 days from the starting day of the change;
- all changes in the information on the production processes, the formulas, the ingredients or the suppliers concerning the products object of the certification or approval;

In case of changes, the Operator shall wait the communication of the CB about the approval of the new conditions, about their conformity and the need of carrying out a new inspection for evaluating again the starting conditions; only after that the Operator can continue declaring the products as in conformity to the standard.

Moreover, the Operator undertakes to:

- Permit the free access of the inspectors to the production units, to the company registers and to the supporting documents;
- Accept controls even without any advance notice;
- Accept the presence of other people (inspectors of Accreditation bodies or representatives of associations) supporting the inspectors of the CB;
- Inform the CB, by registered letter, of every formal or informal complaint concerning the certified product, within 15 days from its acknowledgement;
- Maintain always updated a list of complaints/non-conformities received from external parties. For every complaint/non-conformity the Operator shall establish and carry out suitable corrective actions, always informing the CB;
- Prevent commingling between certified and conventional products and minimize non-conformities. The operator prepares a "Risk management plan" and handle it to the CB;
- Respect the economic duties reported in this regulation, in time and according to the ways reported in the Article 10 of this regulation;

- Safekeeping the control and certification documents issued and/or received by the CB or other bodies.
- Respect the Community and National rules in force, as well as the particular provisions of ECOGRUPPO ITALIA S.r.l.;
- Accept the sanctions imposed by the CB, without prejudice to the right to lodge an appeal.
- Comply with the law and the underlying contract with the control body.

Art. 6 CERTIFICATION BODY'S DUTIES

The CB engages itself to enforce the following regulation, and particularly it:

- Provides for training and updating the certification file of the Operator;
- Carries out the ordinary supervision activity.
- Assures that every Operator is informed of any change in the certification or approval requirements and checks the fulfilments of these changes within the terms fixed.

In the performance of its duties the CB must respect the professional secrecy and it engages itself to not reveal the confidential information it has received during the inspections and the controls.

Art. 7 SAMPLES AND ANALYSIS

In order to implement an efficient control system, Ecogruppo Italia S.r.l. carries out on the controlled Operators, not only the on-site inspections, but even analysis on collected samples.
The sampling plan respects the following criteria:

- For the Operators that carry out only commercialization activity and that don't carry out any handling of the product, no sampling is provided;
- For all other Operators, at least one sampling during the period of validity of 4 years. If a positivity is noticed, the sampling will be repeated even during next inspection.
  However, the inspector can decide to collect samples during the inspection in order to remove any doubt emerged during the control.

The inspectors shall always take samples in presence of the operator or the company manager and, in any case, of a person with a specific delegation. This person will sign the Form for Sampling (MD COSM 017); the written delegation is not requested if the responsible for the company management is an employee of the controlled Operator.
The sample is made of four quotas and every quota will be put inside a container that will be sealed and labelled with an identification code that the CB issues (Procedure for labelling the product samples PRQ COSM 004). The inspector delivers three of the four quotas to the CB; one quota will remain at the Operator and he must keep it in a suitable way so that the sample quota remains unchanged.
The three quotas at the CB disposal will be used for the analysis; the Operator can use his quota for his own controls.
The sample quotas are submitted to accredited tests according to the rule ISO/IEC 17025.

1. If the result of the first analysis is negative, as far as the substances researched are concerned, the analytic control ends and the other sample quotas are disposed.
2. The CB will send the Operator a copy of the Report of Analysis.
3. If the result of the first analysis is positive, for one or more non-conform substances, the following procedure will be carried out:

- The CB sends the Operator a written communication notifying him the ongoing control activity and the result of the analysis, prescribing the precautionary quarantine of the product (concerned lot) since the end of the control. The CB requests to the Operator the analysis of the causes and any useful information;
- Within 10 days from the dispatch date of the above communication, the Operator has the right to request a revision analysis on the second quota that the CB keeps. This second analysis will be executed at another laboratory, always in conformity with the above-mentioned requirements. The CB and the Operator choose this laboratory in agreement;
- If the Operator doesn't request the revision analysis, the CB proceeds with the sanction;

4. If the result of the second analysis is positive, for one or more non-conform substances, the CB proceeds with the sanction;
5. If the result of the second analysis is negative, as far as the substances researched are concerned, (and it is different from the result of the first analysis), the CB requests the third revision analysis on the third quota that the CB keeps. The third analysis will be executed at another laboratory, different from the previous ones.
6. The result of the third analysis solves the case, confirming the result of the first or of the second analysis. On the result of this last analysis the CB takes a final decision on the conformity.

The CB reserves the right to subcontract the analysis activity to external laboratories, always accredited according to ISO/IEC 17025.

For the second and third analysis the Operator can appoint an expert and can decide to execute the analysis in laboratories different from those having an arrangement with the CB, provided that they are accredited according to ISO/IEC 17025.

The list of the laboratories having an arrangement with the CB is at disposal on the web site www.ecogruppoitalia.it, or it can be requested at the Head Office.

Art. 8 ISSUE, USE AND VALIDITY OF THE CERTIFICATION DOCUMENTS.

The Sole Manager signs all the certification documents that Ecogruppo Italia S.r.l. issues. The decision of issuing a document is the responsibility of the Cosmetics Office. The office staff evaluates the conformity of the Operator in function of the control activity carried out by the inspector and fills in the "Certification decision report" MD COM 037; the employee of the Cosmetics Office issues the document and signs it. The function responsible of the certification decision can never be the same that has carried out the audit.

The documents issued are ratified during the meetings of the Safeguard Impartiality Committee (according to PRQ 017).

Before issuing the certification or approval documents the suitability of the Operator must be evaluated. If the Operator is object of measures because of non-conformities that can compromise its suitability, the Cosmetics Office doesn't issue the document and informs the Operator of the causes of the denial respecting the PRQ COSM 005.

Any exception to the certification or approval requirements is allowed only if fixed by NATRUE through the decisions of the committee "Scientific Committee Criteria and Label", they will have limited duration and are allowed based on suitable documents of the Operator.

The CB uses the following documents attesting the NATRUE certification or approval:

1. Pre-certificate (MD COSM 030);
2. Certificate (MD COSM 031);
3. NATRUE approved item list (MD COSM 036);

The Operators can use these documents only in order to indicate that their products are in conformity with the standard NATRUE. The same documents must not be used to discredit the CB and they must be given back to the CB (on request) or they must be destroyed (the destruction must be documented) if the Operator withdraws or is excluded from the control system.

Pre-certificate

The pre-certificate is the document that certifies the conformity of a product (raw material, cosmetics) to the particular requirements of the standard, just based on a documentary control. The document is issued if the CB has received correct and complete documents. The document is valid for 6 months, during which one on-site inspection will be carried out during a production process. If the result of the inspection is positive the pre-certificate will be substituted with the certificate.

Certificate

The Certificate states for which products the Operator can issue conformity statements.

The CB issues the Certificate. It has a maximum validity of 24 months from the date of the first issue.

The Cosmetics Office issues the Certificate just after the conformity of the Operator has been controlled. The evaluation is based on the most recent information acquired during the inspection at the production sites.

The document is made of two inseparable sections:

-The Section A reports the certificate number, the personal and identification data of the Operator and the version of the Standard according to which the certificate is issued. It also reports the date of the first issue, any date of change and the expiry date.

-The Section B (Annex's Certificate) shows the certificate number it belongs to, the name of the Operator and the products for which the Operator is certified, the level of certification obtained, and the validity of the certification for every reference.

The Cosmetics officer issues the Certificate, stamps and signs it; the certificate is signed by the Sole Manager.

The Operator keeps the original Certificate and he distributes the copies.

The Cosmetics Office can revoke the Certificate if some non-conformities are noticed.

The CB is not responsible for the inappropriate or wrong use of the Certificate. The Operator has the legal responsibility in case of non-respect of the rules concerning the product marketing.

The Certificate cannot be used as a batch certificate or transaction document.

The CB reserves the right to go to court if it notices an inappropriate use of the Certificate.

If the Operator has a valid Certificate and he is excluded or he decides to exit the control system of the CB, he must give the document back, if the CB requests it.

NATRUE approved item list

It is a document that lists the formulas or raw materials which have been approved following the verification of the conformity with the NATRUE criteria.

This document has a validity of 24 months from the date of the first issue.

Art. 9 USE OF THE TRADEMARKS

The Operator who has obtained the NATRUE certification or approval can claim it following the guide lines that NATRUE has published in the document “LABEL USAGE GUIDELINES”.

Art. 10 CLAIMS AND LABELS

The Operator will send the CB the proof of the label in order to verify the right use of the logo, following the guide lines “Label usage guidelines”.

The proof will be sent again after any significant change in the label concerning the use of the logo NATRUE or claims concerning the certification or approval.

The CB is not responsible for the inappropriate or wrong use of the logo NATRUE or of the claims concerning the certification or approval. The Operator has the legal responsibility in case of non-respect of the rules concerning the product marketing.

The CB reserves the right to go to court if it notices an inappropriate use of the Certificate. The Operator will have to refund the damage caused.

Art. 11 COSTS

The cost of the certification or approval process is based on the Price list (MD COSM 025). The Economic offer (MD COSM 029) for every Operator is based on the price list in force and on the information reported in the Form Request of certification documents (MD COSM 018).
The tariff is intended as annual and is to be paid within thirty days from the date of the invoice, apart from any extension of payment that the administrative office may allow.

Any laboratory analysis on product samples taken at the Operator represents an additional cost. The payment of such costs shall respect the terms reported in the request of payment sent by the Administrative Office of the CB. The non-payment of the requested tariff, including the analysis costs, can cause the withdrawal of the certification or approval and the annulment of all licences already issued.

Art. 12 NON-CONFORMITIES AND FOLLOWING SANCTIONS

In case of remarks, the staff of the Cosmetics Office communicates the results to the Operator, requesting his proposal of corrective action.

The Operator must propose suitable corrective actions, indicating a deadline for their implementation. The Cosmetics Office assesses the proposed corrective actions and if they are accepted, the same office evaluates the conformity and judges the operator as fit. If necessary, the implementation of corrective actions might be checked through an "ad hoc" inspection.

The Cosmetics Office establishes then if inflicting or not the sanction provided and it informs the Operator with a communication signed by the proposer and the SM.

The sanction must be inflicted from an employee of the Cosmetics Office different from the one who has issued the NC.

There are three levels of non-conformity: non-observance, irregularity and infraction. The corresponding sanctions are tuned according to the capacity of the non-conformity to compromise the solidity of the control system.

Non-observance

It is a slight non compliance not undermining the conformity of the production process, the self-checking system on the production method, the management of the firm documentation, not having long-lasting effects, not implying substancial changes of the certification status of the products or the operator, or his/her reliability.

Non-observances can be minor or major, depending on their effect on the conformity to the standard.

Irregolarity

It is a non-compliance undermining the products certification, but not the self-checking system on the production method and the management of the firm documentation. It does not have long-lasting effects and does, not imply substantial changes of the certification status of the products or the operator, or his/her reliability.

Infringement

It is a severe non-compliance undermining the conformity of the production process, or the self-checking system on the production method, or the management of the firm documentation, or the compliance of the contractual obligations with the control body.

Infringements cause long-lasting effects on the certification status of the products or the operator, or his/her reliability.

Based on the level of gravity and on the graduality principle, the following sanctions are inflicted: Reprimand or Warning (for non-observances), Withdrawal of organic labelling (for irregularities), Suspension of the certification and Exclusion of the Operator from the control and certification system (for Infringements).

Reprimand

It is a sanction that doesn't have any effect on the certification. The control of the corrective action takes place during the next inspection or at the CB offices. The non-respect of a reprimand causes the infliction of a more important sanction, usually a warning.

Warning

It is a sanction that doesn't have any effect on the certification, provided that the non-conformity is positively closed within the reported terms. The control of the corrective action takes place during the next inspection or at the CB offices. The non-respect of a warning causes the infliction of a more important sanction, usually the suppression of the organic information.

Withdrawal of organic labeling

The Operator can't report, on the labels and on the documents of the irregular products, the information concerning the certification of the relevant batch. The control of the implementation of the corrective actions and of their effectiveness takes place during the next inspection. The non-respect of a withdrawal of organic labelling causes the infliction of a more important sanction, usually the suspension of the certification.

Suspension of the certification

It is the temporary suspension of the certification of conformity to the standard NATRUE. It is inflicted when the reliability of the controlled operator is compromised. During the suspension period the operator cannot commercialize the products referencing information on the certification NATRUE. The suspension can be referred to on or more processing areas or to the whole company. It can be also applied to singular processing lines. The control of the corrective action takes place in the respect of the sanction provisions. Usually, the non-respect of a suspension causes the exclusion of the Operator.

Exclusion of the Operator

It takes place in case on infractions compromising the reliability of the Operator's company management and so his permanence in the control system, or when the same infraction is reiterated or when the Operator doesn't respect the commitments towards the competent authorities and/or the CB.

The CB Technical Committee of Certification has to confirm all sanctions.

The Operator is informed about applied sanctions through a registered delivery letter or equivalent means. The communication can be anticipated by fax.

In this case the CB requests the Operator to discontinue the use of certificates and NATRUE logos.

Art. 13 APPEALS

Within 15 days from the sanction letter receipt, the Operators can appeal against the CB decisions and/or sanctions.

The QM manages the appeal according to the PRQ 006 (Procedure of Appeal), available on the website www.ecogruppoitalia.it.

If the two parties cannot solve the case, they can go to court and the competent court is that of Catania.

The CB will send NATRUE an annual report concerning all the appeals managed within the certification system considered.

Art. 14 COMPLAINTS

All Operators in the control system of the CB have to keep records of the complaints related to the activities and products under certification or approval. While performing the control activity, the CB can check the management of the complaints as far as the implemented corrective actions are concerned.

All Operators in the control system of the CB can raise complaints on inefficiencies or other anomalies in the CB activity. The QM manages the complaints according to the PRQ 009 (Procedure for the treatment of the complaints).

The CB will send NATRUE an annual report concerning all the complaints managed within the certification system considered.