

Başak Ekolojik Ürünler Kontrol ve Sertifikasyon Hizmetleri Tic. Limited Şirketi (hereafter referred to as *Başak Ekolojik*) operates to verify and certify that the products under its authorization are produced in compliance with the entire production chain at each stage, based on the EU Regulation **(EU) No 2018/848 and related delegated and implementing acts**, as well as the Organic Law No. 5262 dated 01.12.2004 and the Regulation on the Principles and Implementation of Organic Farming No. 27676 dated 18.08.2010.

1. SCOPE OF AUTHORITY

Control and certification scope under the Turkish Organic Farming Regulation:

- Organic Plant Production
- Organic Animal Husbandry
- Organic Processing, Packaging, Labelling, Storage, Transportation, and Marketing of Organic Products

Control and certification scope under the EU Organic Regulation (EU) 2018/848:

- A: Live or unprocessed agricultural products, including seeds and other planting material;
- D: Processed agricultural products, including aquatic animals and products intended for use as food;
- G: Other products not listed under the categories above, but within the scope of Annex I of (EU) 2018/848, **such as cotton (not knitted or felting) and grape leaves;**
 - Products listed under CN codes in the EU agricultural product list (TFEU - Treaty on the Functioning of the European Union, Annex I);
 - Other products that are closely related to agriculture as listed in Annex I of (EU) 2018/848.

The activities related to collective catering operations, as defined in Article 2(2)(d) of Regulation (EC) No 1169/2011, are not included within the scope of (EU) 2018/848.

Uptake, labeling, and control of products produced during collective catering activities may follow national rules or, in the absence of such rules, specific standards.

The EU organic logo shall not be used on the labeling, presentation, or advertising of such products.

Definitions:

- **Preventive measures:** Precautionary actions taken by operators at all stages of production, preparation, and distribution aimed at protecting biodiversity and soil quality, preventing and controlling pests and diseases, and avoiding negative impacts on the environment, animal health, and plant health.
- **Reactive measures:** Measures that operators must take at all stages of production, preparation, and distribution to prevent contamination by products or substances not authorized in organic production under (EU) 2018/848, and to prevent mixing of organic and non-organic products.
- **Operator:** Any natural or legal person responsible for compliance with Regulation (EU) 2018/848 at all stages of production, preparation, and distribution.
- **Farmer:** Any natural or legal person or group of persons engaged in agricultural activity, regardless of their legal status under national law.
- **Plant:** Living plants, including fresh fruits, vegetables, and seeds, and their parts.

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Page No	1 / 19		

- **Planting material:** Any part of a plant capable of producing new plants, including seeds, intended for planting, and all parts of plants capable of growing.
- **Food:** As defined in Regulation (EC) No 178/2002, any substance intended for human consumption, whether processed, semi-processed, or unprocessed.
- **Implementing Regulation:** The specific rules set by the European Commission which are limited in scope and aim to ensure uniform application of EU legislation.
- **Delegated Regulation:** Acts that supplement or amend the primary legislation, especially concerning non-essential or specific provisions.
- **Non-compliance:** Failure to comply with the basic legislation or with the implementing and delegated acts based on the authority delegated under the legislation.
- **Production, preparation, and distribution stage:** Any phase from the initial production to storage, processing, transportation, sale, or reaching the final consumer, including labeling, advertising, import, export, and subcontracting, when relevant.
- **Traceability:** The capability to track and trace any food or feed item through all stages of production, processing, and distribution.
- **Holding:** A single legal or physical entity operating multiple units producing listed products, excluding certain products like Essential oils and Yeast, as listed in Annex I of (EU) 2018/848.
- **Placing on the market:** The act of offering for sale, including free of charge, any food product, or other delivery, as defined in Article 3(8) of Regulation (EC) No 178/2002.
- **Adverse weather conditions:** Natural events such as frost, storms, hail, ice, heavy rain, or drought that can threaten crops.
- **Environmental event:** An incident involving pollution, contamination, or degradation of the environment limited to a specific geographical area, excluding broader risks such as climate change.
- **Natural disaster:** A natural event that causes significant damage to agricultural or forestry systems, resulting in substantial economic loss.
- **Catastrophic event:** An unforeseen event caused by human activity leading to severe damage to systems and significant economic losses.
- **OFFIS:** The European Organic Information System.
- **Integrity of organic or transition products:** The absence of non-compliance or repeated or deliberate violations affecting the product's organic status at any stage of production, processing, or distribution.

2. APPLICATION PROCESS

2.1 Application Review

- **The applicant submits** the information on the Application Form F-P01.01, available from Başak Ekolojik's office or website (www.basakekolojik.com.tr), along with the requested supporting documents. Başak Ekolojik **reviews the**

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Page No	2 / 19		

applicant's compliance with the main criteria and its capacity in accordance with the [T-P15.07 Instruction on Reviewing The Applications of the Clients](#).

Additionally, the following procedures are carried out in accordance with Regulation (EU) 2018/848:

- **(EU) 2021/1698 Article 10(4):** Başak Ekolojik verifies that the applicant's certification has not been withdrawn by the previous certification body within the last two years. ***In case of withdrawal, certification cannot be granted.*** (Note: The withdrawal of recognition of the previous certification body by the Commission for third countries and product categories as per Article 46(2a) of Regulation (EU) 2018/848 ***is not considered here***).
- **(EU) 2021/1698 Article 10(1)(b):** ***Başak Ekolojik*** must obtain a written confirmation that the applicant or group of operators has not been certified by another certification body ***for activities related to the same third country and product category; this applies to operations at different stages of production, preparation, or distribution.***
- **(EU) 2021/1698 Article 10(1)(c):** Confirmation must be available from members of the group that they are not individually certified for the specific product within the scope of the group's certification.
- The application form will be evaluated regarding:
 - ***Definitions related to activities, units, and products;***
 - Evidence that ***operators*** and members of ***group of operators*** are legal persons or entities and ***group of operators*** are legal entities according to national law;
 - The list of group members of operators as per (EU) 2021/279 Article 5(a);
 - The individual parcel list for crop production, including size and location.

2.2 Price Quotation and Signature

The operator's requested certification scope, as well as the required frequency, duration of controls, and certification evaluations, are considered to determine the pricing according to [T-P01.04 Organic Agriculture Control And Certification Pricing Instruction](#). **Based on this**, Başak Ekolojik provides the control and certification fee to the operator via the [F-P01.04.01 Organic Agriculture Control And Certification Price Offer Form](#).

2.3 Contract Signature

The operator wishing to engage in organic farming enters into a contract with Başak Ekolojik. Once the operator approves the [F-P01.04.01 Organic Agriculture Control And Certification Price Offer Form](#), they are provided with the sample [S-P01.01 Organic Farming Inspection And Certification Service Agreement](#), prepared in accordance with applicable legal regulations. The operator must sign and return the contract within a maximum of 30 days, with a wet signature, which will be filed at Başak Ekolojik.

- The Organic Control and Certification Service Contract shall include commitments under Article 10(1-d) of Regulation (EU) 2021/1698, such as:
 - ***Granting access to all production units, facilities, accounts, and related supporting documents for control purposes to the control authority and Başak Ekolojik;***
 - ***Providing any necessary information to Başak Ekolojik and, when required, to the control authority;***
 - ***Submitting results of internal quality assurance program results upon request by the control authority or Başak Ekolojik;***

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Page No	3 / 19		

- *Reporting in writing and without delay to product purchasers and Başak Ekolojik, and if necessary to the control authority, any suspicion of non-compliance that cannot be rectified or that affects product integrity;*
 - *Accepting the transfer of control files in case of change of control body or ; in case of withdrawal from organic production to keep the files for 5 years as per the last control body or authority;*
 - *Immediately informing Başak Ekolojik and the control authority in case of withdrawal from organic production;*
 - *Accepting the exchange of information among control bodies if the operator or group operatör or its subcontracted units are inspected by different control bodies;*
 - *Conducting activities in accordance with organic farming rules;*
 - *Implementing corrective measures as determined by the control body and authority in case of non-compliance.*
- **(EU) 2021/1698 Article 1(2-e):** The translation of production rules and control measures specified in the applicable accreditation and authorization regulations, based on delegated acts, will be made available in multiple languages and provided for use by the operator and group members who sign the contract with Başak Ekolojik.

3. SUBMISSION AND EVALUATION OF ORGANIC SYSTEM PLAN (OSP) FROM THE OPERATOR

The operator who has signed the contract must submit, in addition to the information provided in the application form and supporting documents, a fully detailed description of the production units, along with a properly completed **Organic System Plan (OSP)** tailored to their activity scope. ***This should be sent at least 10 working days prior to the planned inspection date*** to ensure Adequacy for control. Upon receipt, the submitted **OSPs** will be evaluated ***in accordance with T-P15.10 Instruction on Assessment of Organic System Plan*** before the inspection takes place, verifying that all phases of production are thoroughly described and that all mandatory appendices are included. If there are deficiencies or if the ***OSP is not submitted in a timely manner***, the inspection plan ***cannot proceed***, and the operator will be notified to complete the **OSP** with all required appendices.

In accordance with **(EU) 2021/1698 Article 9(2)**, to verify compliance with Regulation (EU) 2018/848, controls conducted by Başak Ekolojik in third countries will be carried out regularly, based on risk assessments, over the entire process of production, preparation, and distribution, considering the following elements detailed in the Organic System Plan (OSP):

- Newly added land parcels, their type, size, the structure of the operator or group of operators, and the number of new members joining the operator group;
- Location and complexity of the activities or operations of the operator or group of operators;
- Duration of involvement in organic production, processing, and distribution;
- Results of internal audits conducted according to the system's documented procedures for internal controls within the operator group;
- Whether the units include non-organic or transition period products;
- Types, quantities, and values of products;

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Page No	4 / 19		

- g) Risks of product contamination or mixing with non-permitted products or substances;
- h) Waivers or derogations and rule exceptions for the operator or group of operators;
- i) Critical points of non-compliance at each stage of production, processing, and distribution;
- j) Use of subcontractors;
- k) Changes in the control body of the operator or group of operators;
- l) Any information indicating violations of Regulation (EU) 2018/848.

Additionally, in line with **(EU) 2021/1698 Article 10**, before inspection, Başak Ekolojik ensures that the operator or group has provided the following information via the Organic System Plan (OSP):

- Detailed description of organic and/or transition units, including any units involved in non-organic activities, and activities conducted under Regulation (EU) 2018/848;
- Relevant measures at the unit, facility, or activity level to ensure compliance with regulation;
- Measures to reduce the risk of contamination from non-permitted products or substances, including cleaning procedures during production, processing, and distribution.

Furthermore:

1. If an operator or group of operators uses fertilizers or soil conditioners, these inputs must be listed in the OSP, and the **F-P15.14 Application For Approval Of Non-Farmyard Fertilizer, Soil Conditioner And Nutrients** must also be completed and submitted to Başak Ekolojik. Başak Ekolojik will evaluate the input according to Regulation (EU) 2021/1165.
2. If an operator or group of operators uses plant protection products, these inputs must be listed in the OSP, and the **F-P15.15 Application Form for Approval of Plant Protection Inputs** must be completed and submitted. Başak Ekolojik will evaluate these inputs in accordance with Regulation (EU) 2021/1165.
3. Regulation (EU) 2021/1165 is the primary regulation for reviewing inputs such as non-farm plant protection products, fertilizers, cleaning and disinfection agents, food additives, processing aids, and non-organic agricultural contents.

4. OPERATOR RISK ASSESSMENT

Based on the obtained information from the application procedures and the evaluation of the **Organic System Plans (OSPs)**, a risk assessment is conducted annually for each operator. Başak Ekolojik evaluates the product and the operator separately **in accordance with T-P01.01 Instruction for Risk Assessment of the Operators** and **fills out** the **L-P01.01 Operator Risk Analysis List**.

5. HIGH-RISK PRODUCTS

In accordance with Regulation (EU) 2021/1698 Articles 8, 12, and 16, and based on the list or notifications from the European Commission pursuant to Article 46(8) of Regulation (EU) 2018/848, for products originating from third countries that are identified as high-risk or listed by Başak Ekolojik's risk assessment, Başak Ekolojik will:

- Conduct at least two on-site inspections annually for each operator and group of operators. One of these inspections is unannounced.

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Page No	5 / 19		

- In addition to the sampling rate determined in the **L-P01.01 Operator Risk Analysis List**, at least one sample of the product in the field is taken each year. According to Başak Ekolojik's assessment, samples are taken at the most appropriate time to detect potential use of non-permitted substances. For operators not involved in production, samples are taken from incoming raw materials, semi-finished, or processed products.
- Perform systematic physical controls and, considering the sample rates defined in the latest information shared by the European Commission, take at least one representative sample from shipping. Moreover, Başak Ekolojik will have complete traceability documentation, including invoices, from operators or groups of operators. Upon the Commission's request, Başak Ekolojik will send this traceability documentation and the results of the sample analysis to the control body of the importer and the competent authority of the Member State confirming the shipment.

Başak Ekolojik monitors updates to Regulation (EU) 2021/1698 and incorporates relevant changes into its verification processes.

6. CONTROL PROCESS

6.1 Planning and Preparation of the Control

Following the risk assessments of the operators, a control plan is prepared covering the entire year. ***In accordance with TR Regulation and (EU) 2021/1698 Article 9, each operator and group of operators will undergo at least one verification annually according to the scope of the contract, ensuring compliance with TR Regulation and/or Regulation (EU) 2018/848. This verification will include a physical inspection.***

Estimated start and end dates of the control, along with the number of control days, are calculated. When preparing the plan, considerations include that an inspector ***may perform a maximum of three consecutive controls*** on the same operator. The number of producers to be physically checked in a day is determined based on risk assessment and the control days in the scope of the contract.

- **Başak Ekolojik applies the following procedures based on the risk analysis:**
 - ***Selection of operators for unannounced controls and visits based on risk analysis and their risk levels;***
 - ***Conducting at least 10% additional random control visits for contracted operators according to their risk category;***
 - ***Ensuring at least 10% of all controls and visits are unannounced;***
 - ***As a result of the general assessment of the risk of non-compliance with organic production rules, covering all stages of production, preparation and distribution, samples are taken from at least 5% of the number of operators under control, with at least 2% being taken in unannounced controls every year.***
 - Controls conducted as a follow-up to suspected or identified non-compliance are not included in the ***minimum percentage calculations*** for random controls.
 - In case of a low risk assessment, Başak Ekolojik normally re-controls at least 5% of group members, with a minimum of 10 members (external control). If the group has 10 or fewer members, all members are re-controlled.
 - If the risk assessment is medium, at least 6% (minimum 12) members are re-controlled.
 - If the risk assessment is high, at least 8% (minimum 16) members are re-controlled.

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Page No	6 / 19		

6.2 Implementation of the Control

Başak Ekolojik controllers are informed of the controls through the annual control plan and receive control assignments related to the control activities. ***The control plan is notified to the operator according to the control type specified in the annual control plan and assignment, or is carried out unannounced (without prior notice).*** The control activity is carried out with the operator registered in the application and with whom the contract has been signed, or with the person officially authorized by the operator. During the control, the controller will complete the appropriate control report for the operator's activity. After the control, the controller delivers a copy of the report, signed by both the controller and the operator, to the operator. The control report includes the Control form, NC Non-compliance Summary List, Başak Ekolojik Sanction Categories List, and documentation with signatures for approval.

Oversight / Follow-up Control

Based on the operator's risk assessment results, if physical control is required before issuing a control certificate – such as a Certificate of Inspection (COI) – or a product certificate, or in the case of suspicion or verified significant non-compliances during the certification process, Başak Ekolojik conducts an oversight control before issuing the certificate to ensure the integrity of organic products and compliance with relevant legislation.

Following investigations into repeated non-compliances, the operator may be subject to increased control frequency within the scope of quality assurance systems, improvement of procedures to maintain the integrity of organic products, or on-site follow-up to verify that labels on products with canceled certificates have been corrected and organic products have been removed from storage.

AB Regulation on the Structure, Composition, and Control of Producer Groups

- The formation of the Producer Group, documented procedures necessary for the Internal Control System (ICS), the duties of the ICS Manager and controllers, the content of membership agreements, and conditions under which the group may be withdrawn by the control authority, are specified in **(EU) 2018/848 Article 36**.
- The composition and size of a producer group are specified in **(EU) 2021/279 Article 4**:
 - A producer member only registers with one producer group for a specific product, even if involved in different activities related to that product;
 - The maximum size of a producer group is 2,000 members;
 - Producer groups must comply with this regulation by January 1, 2025, at the latest.
- According to **(EU) 2021/279 Article 5**, producer groups shall keep the following documents and records for the purposes of the Internal Control System (ICS):
 - List of producer group members;
 - Membership agreements signed by the legal entity and the member, detailing rights and responsibilities;
 - Records of internal control reports signed by the ICS controller and the examined member;
 - Records of training of ICS controllers;
 - Records of training of producer group members;
 - Records of measures taken in case of non-compliance identified by the ICS manager;
 - Traceability records, including quantity information;

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Page No	7 / 19		

- Written agreements and contracts between the operator and subcontractors, including the nature of subcontracting activities;
- Appointments of the ICS manager and controllers.
- According to **(EU) 2021/279 Article 6**, the ICS manager shall immediately report the following information to Başak Ekolojik:
 - Any suspicion of major or critical non-compliance;
 - Suspension or withdrawal of a member, a production unit, or facilities including collection and purchase centers from the group;
 - Prohibition of a product's marketing as organic or during the transition period, including the name of the relevant member(s), quantities, and batch identifiers.
- Pursuant to **Regulation (EU) 2021/771 Article 2**:
 - Başak Ekolojik appoints competent controllers to evaluate and approve the compliance of a producer group's internal control systems (ICS);
 - The establishment, operation, and maintenance of the Internal Control System of the producer group are evaluated;
 - The Başak Ekolojik controller will assess the risks of the producer group to select members for external controls, considering production volume, value, non-compliance risk according to **(EU) 2018/848** requirements, and preliminary risk assessments made by Başak Ekolojik before control; External controls are physically performed on-site, with selected members ready for inspection, and sampling is carried out after reviewing the Internal Control System;
 - In accordance with **(EU) 2021/1698 Article 9(7)**, Başak Ekolojik will re-audit at least 5% of members annually, with no fewer than 10 members, and all members will be re-audited if the group has 10 or fewer members;
 - Başak Ekolojik allocates reasonable time periods for the control of a producer operator. Başak Ekolojik will spend a minimum of 1 day to verify the Internal Control System (ICS); the number of days may increase depending on the size and complexity of the ICS.
 - Başak Ekolojik will conduct at least two (2) witness audits during the operator's internal control to verify the competence and knowledge of each ICS controller.

Sampling, Verification, and Analysis of Shipments Intended for Import into the European Union

In accordance with **EU 2021/1698 Article 16**, Başak Ekolojik verifies the compliance of shipments intended for import into the **European Union** under the main regulation **(EU) 2018/848** and the delegated regulation **(EU) 2021/1698**. This verification may include systematic document checks, physical controls, and **sampling** before the shipment departs from the third country or the country of origin, in accordance with risk assessment procedures.

Başak Ekolojik **collects samples for analysis at the most appropriate times, based on the outcome of risk assessments** specified under Head 4 of the **P-05 Sampling Procedure**, within the scope of TR and EU regulations. The selection of operators and groups that require sampling considers all stages of production, processing, and distribution, with a risk assessment that includes the potential non-compliance with organic production rules.

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Page No	8 / 19		

Controls during sampling also consider the detection of non-conforming production techniques or suspected use of unauthorized substances.

In accordance with both TR and EU regulations, Başak Ekolojik **takes at least 5% of samples from operators under control each year, at least 2% of the total number of operators, in unannounced inspections.** For group operators, samples are taken from at least 2% of members in each group.

Details of the samples taken by Başak Ekolojik controllers are recorded on the ‘Sample Collection Form,’ and a copy of this form is delivered to the operator. Before sending the samples to the laboratory for analysis, Başak Ekolojik contacts the operator to inform about contracted laboratories. In accordance with **EU 2021/1698 Article 12(7)**, control bodies may delegate sampling activities to a control body recognized by the European Commission under **(EU) 2018/848** or to an accredited laboratory under ISO/IEC 17025 for “General requirements for the competence of testing and calibration laboratories.”

Written Records of Controls

Written records can be in paper or electronic form. Başak Ekolojik retains these records for 5 years from the date of certification decision. These records particularly include:

- An explanation of the control’s purpose;
- The control methods and techniques applied;
- The outcomes of the **controls**, including verification of inspected elements, **sampling details**, and so on;
- Actions required by the relevant operator or group operator, including the final deadline, based on control results.

A copy of this record is kept by the operator or a controlled member of the group operator, either in paper or electronic format.

6.3 Non-Conformities and Sanction Catalogues

Non-Conformities

Başak Ekolojik considers practices contrary to **TR regulations** on organic farming as non-conformities and **has developed a general catalogue for measures to be taken in case of detection of a non-conformity.**

According to Başak Ekolojik Sanction Policy, summarized in sanctions categories:

- Minor Non-Conformity (Certification proceeds): **Minor deficiencies in documents, such as incomplete records or disorganized documentation;**
- Major** Non-Conformity (Certification does not proceed): **Significant deficiencies or absence of documents, or cases where corrective actions are not implemented within the specified timeframe, requiring suspension of certification, land or product suspension, or additional controls;**
- Critical** Non-Conformity (Certification does not proceed): Practices in production, processing, storage, labeling, or marketing that violate regulations, **leading to non-certification of specific or all products, batches, lands, or plots, or removal during a new transition process.**

In accordance with **EU Regulation (EU) 2021/1698 Article 22**, Başak Ekolojik has developed a general catalogue of measures to be taken when a non-conformity is detected. This catalogue includes: **Basak Ekolojik** has developed a general catalogue of measures to be taken in the event of a non-compliance detection, in accordance with Article 22 of Regulation (EU) 2021/1698. This measure catalogue covers the following:

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Page No	9 / 19		

a. A list of non-compliances referring to Regulation (EU) 2018/848 or to regulations or implementing rules adopted under this Regulation based on delegated authority.

b. The classification of non-compliances into at least three categories—**minor, major, and critical**—considering the following criteria:

- Implementation of precautionary measures, practical actions, and the reliability of the operator's or group operator's own controls;
- Impact on the integrity of products in organic or conversion status;
- The traceability system's ability to locate the affected product(s) within the supply chain, and the prohibition of importing such product(s) from a third country for the purpose of placing them on the Union market in relation to organic production;
- The response provided by the operator or group operator to previous requests from Başak Ekolojik.

c. The measures to be applied for each non-compliance.

Catalogue of Measures (In compliance with (EU) 2021/1698, Annex IV, Part A and B)		
Category of non-compliance	Situations	Measure
Minör	the case of non-compliance is minor when: i. the precautionary measures put in place by the operator/group of operator are proportionate and appropriate, and the controls that the operator has put in place are efficient according to the assessment by Başak Ekolojik; ii. the non-compliance does not affect the integrity of the organic or in-conversion product; iii. the traceability system can locate the affected product(s) in the supply chain and the product can be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production	Submission by the operator/Group of operator of an action plan within two(2) months setting on the correction of the non-compliance(s).
Majör	the case of non-compliance is major when: i. the precautionary measures are not proportionate and appropriate and the controls that the operator/group of operator has put in place are inefficient according to the assessment by Başak Ekolojik; ii. the non-compliance affects the integrity of the organic or in-conversion product; i.a. Significant deviation between input and output calculation (mass balance) iii. the operator/group of operator did not correct in a timely manner a minor non-compliance; iv. the traceability can locate the affected product(s) in the supply chain and the product can be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production.	The Non-Compliance should be corrected in 1 month at a maximum. -No reference to organic production in the labelling and advertising of the entire lot or production -Prohibition of import from a third country for the purpose of placing that product on the market within the Union as organic production for a given period -New conversion period required -Limitation of the certificate's scope -Improvement of the implementation of the precautionary measures and the controls that the operator/group of operator has put in place to ensure compliance

Document No	RH-01	Prepared by	Checked and Approved by
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Page No	10 / 19		

Critical	the case of non-compliance is critical when: - the precautionary measures are not proportionate and appropriate and the controls that the operator has put in place are inefficient according to the assessment by Başak Ekolojik; - the non-compliance affects the integrity of the organic or in-conversion product; - the operator fails to correct previous major non-compliances or repeatedly fails to correct other categories of non-compliances; and - there is no information from the traceability system to locate the affected product(s) in the supply and the products cannot be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production. Examples: Absent or intentionally incomplete records and financial records, falsification of documents, intentional re-labelling of downgraded products as organic, intentional mixing organic with in-conversion or non-organic products, intentional use of non-authorised substances or products, Intentional use of GMOs, refusing the control body access to premises subject to controls, or to its book keepings	The Non-Compliance should be rectified immediately. -No reference to organic production in the labelling and advertising of the entire lot or production. -Affected products/lots cannot be sold as organic. Any import/transaction certificate for the products/units won't be issued. -Prohibition of import from a third country for the purpose of placing that product on the market within the Union as organic production for a given period -New conversion period required -Limitation of the certificate's scope -Suspension of the certificate -Withdrawal of the certificate
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Operators may appeal non-compliances within a maximum of 14 days. In this case, procedures will be carried out in accordance with our web publication [P-06 Appeals and Complaint Procedure](#).

7. TRANSFER PROJECT FROM OTHER CONTROL AND CERTIFICATION BODIES

Operators previously inspected and certified by another control body must, at the application stage to Basak Ekolojik, present:

- The lists of producers previously reported by the control body,
- Control reports,
- Operator/master certificates,
- Certification decisions,
- Previous non-compliance notifications (both open and closed),
- Analysis reports,
- Up-to-date records of organic product stocks,
- Proof that corrective actions have been taken,
- Other relevant information and documents.

In the case of members from plant production group operators; before initiating transfer procedures, operators wishing to change their control body must submit an application letter to the control body they want to leave. During the application review process, Basak Ekolojik will officially contact the previous control body to request the information mentioned in the first paragraph along with any other necessary documentation.

8. CERTIFICATION PROCESS

Document No	RH-01	Prepared by	Checked and Approved by
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Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	11 / 19		

Operators and group operators cannot market their products as organic or in-conversion products unless they hold a valid “Certificate.”

Certification involves the evaluation and documentation of the operator and the stage of the product’s production, based on the implementation of all control methods. The certification assessment begins once the control file (control report and annexes) is submitted to the certifier.

According to Basak Ekolojik’s relevant procedures, the certifier reviews the control file within 30 days and completes the certification process within 45 days. This period may be extended depending on the operator’s control results and the conditions of the assessment process.

The certifier informs the operator of the certification decision via the Certification Decision Notification. If the operator complies with relevant regulations, standards, and procedures of Basak Ekolojik, the certifier will issue a certificate following the annual inspection and certification process.

Only Basak Ekolojik certifiers are authorized to prepare and sign the operator’s certificate.

The *Operator Certification* indicating compliance of the inspected activity with the Turkish Organic Agriculture Regulation is called the “**Organic Operator Certification**” and includes information specified in Annex-11 of the Turkish Regulation. It is prepared in Turkish. Certification details are entered into the TBS system no later than 45 days after the certification.

For activities compliant with **EU Regulation EU 2018/848**, a *documentary evidence model* called the “**Certificate for operators, groups of operators, and exporters in third countries for products to be imported into the European Union as organic or in-conversion products**” is issued **electronically via the Trade Control and Expert System (TRACES)**.

The *date of issuance* of the certificate is the date when the certifier completes the evaluation and issues the certification decision, which is the “**Date of Issue.**”

According to the **TR Regulation**, the *validity end date* of the certificate is 12 months from the date of issue. The 12 months after this date constitute the “**Certificate Validity Period.**”

Following the issuance date, the certificate is valid for 15 months according to the EU Regulation, which means the validity end date is 15 months from the date of issue.

Certificates issued to operators are published on our website in the “**Basak Ekolojik Current Operator List.**”

The certificate is updated whenever there are changes to its data.

According to **Article 10(3) of EU Regulation 2021/1698**, if the previous control body does not transmit necessary information to Basak Ekolojik or if there are any doubts regarding the transmitted information, Basak Ekolojik **will not issue or renew certificates** for operators or group operators until these doubts are resolved.

Product Certification

For **Turkish Organic Agriculture Regulation**, the *product certification* and *bulk product certificate* are prepared in Turkish; for EU Organic Regulation, the Transaction Certificate (TC) for non-EU buyers and the Certificate of Inspection (COI) for EU buyers are issued electronically through the **TRACES system** in English.

Product certification is not issued to individual producers within the producer group under the TR Regulation. Instead, certificates are issued to the primary operator of the group, with the production source coded accordingly.

The operator applies for the **COI-Transaction Certificate (TC) - Product Certification** by filling out the relevant request form and attaching the required documents to Basak Ekolojik’s certification unit.

If the **application review is successful**, the product certificate **and TC** are sent to the operator via courier or email, and the product certification information according to the TR Regulation is entered into the TBS system.

The COI certificate is prepared and electronically approved in the TRACES system.

Document No	RH-01	Prepared by	Checked and Approved by
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Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	12 / 19		

Additional Rules on Actions in Case of Non-Compliance with EU Regulation

In accordance with **Article 22 of EU Regulation 2021/1698**, in addition to the measures referred to in **Articles 29(1), (2), and (3) of EU Regulation 2018/848** and **Article 2 of Implementing Regulation 2021/279**, Basak Ekolojik, upon receiving verified information including but not limited to data indicating the import of a product containing terms related to organic production but potentially non-compliant with Regulation (EU) 2018/848, or if in doubt, or if notified of suspicion of non-compliance by a control authority or control body, will:

- Immediately conduct an investigation to verify compliance with Regulation (EU) 2018/848 or the authorized regulation or implementing regulation;
- Prohibit the import of the affected product(s) into the Union for marketing as organic or in-conversion products until the investigation is concluded.

Additional Rules on Measures in Case of Non-Compliance with EU Regulation

According to **Article 23 of EU Regulation 2021/1698**, in the event of non-compliance affecting the integrity of organic or in-conversion products at any stage of production, preparation, or distribution—such as the use of unauthorized products, substances, or technical methods, or mixing with non-organic products—Basak Ekolojik shall:

- Ensure that all batches or production flows intended for marketing in the European Union do not display or advertise the product as organic if it originated from a third country and has been prepared for EU market authorization;
- Take all necessary actions to identify the source of the non-compliance and to determine the responsibilities of the operator and group operator;
- Implement appropriate measures to rectify the non-compliance and prevent similar violations in the future.

9. SUSPENSION OF THE CERTIFICATION

The procedures for suspending certification are carried out in accordance with the **P-07 Procedures for Termination, Reduction, Suspension, and Withdrawal of Certification**, which is also published on our website.

The suspension of certification is a temporary measure applied prior to withdrawal. The operator's period of suspension may not exceed 6 months.

The certifier informs the operator in writing via the **F-P07.01 Notification Form for Suspension, Withdrawal, Rejection, and Cancellation of Certification** (by **email** or postal mail) regarding the suspension.

During the suspension period, the affected products cannot be marketed under the organic certification reference, and the relevant operator is marked as "suspended" on the **Operator List**, which is continuously updated and published on Basak Ekolojik's website.

10. TERMINATION AND WITHDRAWAL OR REJECTION OF CERTIFICATION

Following the initiation of the suspension process, if the operator does not take actions regarding the reasons for suspension within the time specified in the **P-07 Procedures for Termination, Reduction, Suspension, and Withdrawal of Certification**, or if non-compliances are not addressed, reoccur, or if the operator engages in illegal activities, the operator's certificate is withdrawn or rejected via the **F-P07.01 Notification Form for Suspension, Withdrawal, Rejection, and Cancellation of Certification** and communicated to the operator.

The relevant operators remain listed in the **L-P09.08 Basak Ekolojik Sanction and Termination List** published continuously on the website for a period of **5** years from the first listing date.

11. EXPANSION OR REDUCTION OF CERTIFICATION SCOPE

Document No	RH-01	Prepared by	Checked and Approved by
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Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	13 / 19		

The operator may request an expansion or reduction of the certification scope. However, under the conditions of the Organic Agriculture Control and Certification Service Contract, if there is a change related to certified products or processes, the operator is obliged to inform Basak Ekolojik with a new application form. Basak Ekolojik evaluates the requested scope change, and if appropriate, updates the operator's profile accordingly, which is then resent. If necessary (e.g., implementing new technologies, new storage facilities, or land, new warehouse, agreements with intermediaries, etc.), the certifier will request a control plan from the control body, carry out the evaluation, and inform the operator of the certification decision via the Certificate Decision Notification, listing any non-compliances. If acceptable, the operator's certificate is updated accordingly.

12. USE OF THE CERTIFICATE AND LOGO

The use principles of issued certificates and the organic product logos of Basak Ekolojik and the Accreditation Body are specified in the [T-P01.02 Instruction On The Use Of Certificate And Logo](#) which is published on our website. Regarding the use of the certificate and logo in accordance with the Turkish Regulation, the principles in the **Chapter Five of the Regulation on Principles and Implementation of Organic Farming** and **Annex 10** are applicable. For the European Union Regulation, the logo usage is governed by the [T-P01.03 Instruction On The Use Of EU Logo](#), also published on our website.

13. EXCEPTIONS

13.1. Retroactive Recognition of Conversion Period

The *conversion period* refers to the time elapsed from the start of the activity (***from the moment the operator notifies the control body of the activity***) until the product is certified as organic, in accordance with the relevant Regulation.

Operators may apply to Basak Ekolojik ***for retroactive recognition of the conversion period by providing evidence that the land parcels are natural or agricultural areas and that they have not been processed with products or substances not permitted in organic production.***

In accordance with the Turkish Regulation, operators must submit the [F-POL09.01 Retroactive Recognition Application Form](#), and in accordance with the EU Regulation, the [F-P15.03 Application Form for Retroactive Recognition of the Conversion Process](#) before starting cultivation activities.

The conversion period can be shortened if there is sufficient, realistic evidence that the organic farming requirements have been met within a certain timeframe, based on ***risk analysis, physical control results, analysis findings***, and observations.

- Controls on these land parcels are carried out by Basak Ekolojik before land processing, ***and these control activities are documented in reports.***
- Basak Ekolojik will immediately inform the European Commission and the accreditation body (TÜRKAK) about any approval of retroactive recognition under the EU Regulation.***
- Operators must retain documentary evidence of retroactive recognition and related land parcel usage for 5 years.***

13.2. Permissions for the Use of Conversion and Non-Organic Plant Production Materials

- According to **(EU) 2018/848 Annex II, Section I, 1.8.1**, only organic plant production materials can be used for the production of plant and plant-based products, except for materials outside of plant production.

Document No	RH-01	Prepared by	Checked and Approved by
Release Date	03.11.2021	Betül Aslan	Asaf Özkan
Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	14 / 19		

- However, as an exception to **1.8.1**, under **1.8.5.2**, operators in third countries may use plant production materials in conversion status if they provide justified reasons that sufficient quality or quantity of organic plant production material is not available in the third country where the operator is located.
- Under the specific conditions outlined in **(EU) 2018/848**, when adequate organic or conversion status plant production material is not available in the third country, recognized control bodies can authorize operators in third countries to use non-organic plant production materials in the organic production unit, as per **Article 46(1)** of the EU Regulation.
- In accordance with **(EU) 2021/1698, Article 25**, Basak Ekolojik assesses the provided information, prepares justification for each derogation, and includes relevant details in the annual report submitted to the European Commission.
- Derogations regarding organic plant production materials will expire by **31 December 2036**.

In accordance with the Turkish Regulation, if operators cannot find organic seeds or vegetative propagation materials, they may use conventional or conversion-stage materials. The conditions related to this are detailed in Basak Ekolojik's *POL-04 Conventional Seeds and Vegetative Material Usage Policy*.

13.3. Reporting on Temporary Permits for the Use of Non-Organic Agricultural Content in Processed Organic Foods

- According to **(EU) 2021/1698, Article 27**, if the *Annex V* of **(EU) 2021/1165** does not list such materials, operators in third countries that request permits for the use of non-organic agricultural additives in processed organic foods and are subject to control by Basak Ekolojik can be granted temporary authorization for a maximum of six months.
- The authorization may be extended twice, each for up to six months.
- Basak Ekolojik will immediately notify the European Commission, the accreditation body, and other control authorities and control bodies about any temporary permit granted for the use of non-organic agricultural additives in processed organic foods, in accordance with **(EU) 2018/848, Article 25(4)**.
- This notification will include the justification that the authorization was granted under the provisions of **(EU) 2018/848, Article 25(1)**, using the form provided by the Commission.

13.4. Catastrophic Conditions

- In accordance with **(EU) 2021/1698, Article 28**, for Basak Ekolojik to recognize a situation as catastrophic, there must be an official statement made by the relevant authorities of the third country where the event occurred, citing "adverse climate conditions," "environmental incident," "natural disaster," "catastrophic event," or similar circumstances.
If no such statement exists, Basak Ekolojik will base this recognition on data provided by official organizations that justify the catastrophic conditions.
- Pursuant to **(EU) 2021/1698, Delegated Regulation, Article 29**, upon identification of affected operators in the relevant area or at the request of a specific individual operator or group member, Basak Ekolojik may grant an exception (derogation) for non-organic plant production materials.

Document No	RH-01	Prepared by	Checked and Approved by
Release Date	03.11.2021	Betül Aslan	Asaf Özkan
Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	15 / 19		

- In cases of regional disaster affecting plant and plant-based product production, when it is not possible to use organic or conversion status plant production materials, non-organic plant production materials can be used provided the following conditions are met:
 - Non-organic plant production materials, unless mandated by official authorities, are not treated with plant protection products other than those permitted in plant production under **(EU) 2018/848**, and are not subjected to post-harvest processing with chemicals outside these limits. If chemical treatment is mandatory, the parcel where the processed plant material is grown is subject to a conversion period specified in **Annex II, Section I, Articles 1.7.3 and 1.7.4 of (EU) 2018/848**, where applicable.
 - If the plant production material is in conversion status, it must comply with the requirements outlined in **(EU) 2018/848, Annex II, Section I, Article 1.7.**
 - Additionally, GMO plants, products derived from GMOs, and products produced using GMOs are not permitted for use in plant production materials, in accordance with **(EU) 2018/848, Article 11.**

Derogation (exception):

- a) It is granted for a limited period, not exceeding 12 months, and for no longer than necessary; organic production carried out before the issuance of this exception must continue.
- b) It applies specifically to affected production types or land parcels.
- c) It applies to individual operators or relevant group members.

Basak Ekolojik will immediately notify the European Commission and the accreditation body (TÜRKAK) via the **Organic Farming Information System (OFIS)** about any derogation granted. During this notification, particular attention will be paid to specifying:

- The name of the relevant operator,
- The duration of the derogation,
- The type of production or land parcels involved,
- The reason for the derogation, and
- An explanation from the relevant authorities of the third country.

In cases where no official statement is available, Basak Ekolojik will justify why such a statement has not been included and will provide the relevant data supporting the recognition.

Basak Ekolojik will ensure that any operator applying derogations retains documentary evidence of the derogations, including during the validity period, as well as supporting documentation for the usage of derogation provisions. The organization will verify compliance with the conditions of granted derogations.

After providing official evidence from the relevant authorities of the third country where the event occurred, or in the absence of such a statement, based on official data justifying the catastrophe conditions, the non-organic plant production material derogation will be granted using the **F-P15.04 Form For Using Non-Organic Plant Reproductive Material in Catastrophic Circumstances**.

14. OTHER

14.1. Impartiality and Confidentiality

Document No	RH-01	Prepared by	Checked and Approved by
Release Date	03.11.2021	Betül Aslan	Asaf Özkan
Revision No / Date	03 / 13.01.2025	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Sti. (Başak Ekolojik). It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.	
Page No	16 / 19		

Başak Ekolojik commits that its control and certification activities will be conducted independently and without influence from commercial, financial, or other pressures, and that it will not engage in any activity that causes a conflict of interest when exercising the authority granted by relevant authorities (European Union) and the Ministry of Agriculture and Forestry.

It also commits that it will not undertake marketing, supply, advertising, or consulting services related to certified products. All information arising during certification activities will be managed in accordance with confidentiality principles.

Başak Ekolojik declares that it will carry out certification activities impartially and in compliance with confidentiality principles and has implemented a series of measures to ensure impartiality and confidentiality in its control and certification activities.

The organization is structured to prevent conflicts of interest; control and certification are established as separate units within the organization. Control service providers cannot serve in certification during the same process. Başak Ekolojik's site contains the Statement of Impartiality and Confidentiality, which publicly affirms Başak Ekolojik's commitment to impartiality.

Başak Ekolojik does not consider factors such as religion, language, race, membership in a particular group, political views, land size, or distance when evaluating applications. Unless there is a legal obstacle or the producer is temporarily prohibited from certification, all applications are assessed.

The management of Başak Ekolojik states that it will not compel its employees to act against impartiality nor exert pressure. All certification employees who have provided consulting services in the past two (2) years, directly worked on certification tasks, or have immediate family members responsible for certification activities cannot be assigned to certification services of relevant operators.

Başak Ekolojik staff cannot provide consulting services under any name to all individuals and sectors receiving certification services. Internal audit services cannot be provided to certified clients. All Başak Ekolojik personnel act in accordance with the **T-P04.03 Code of Ethics Directive**.

Material or bodily damages that third parties may suffer as a result of errors, faults, or negligence within the scope of Turkish legal liability and the General Terms and Conditions of the **Occupational Liability Insurance** (Article a.1, paragraph b) are covered up to the limit specified on the policy renewed annually by Başak Ekolojik, per incident.

Başak Ekolojik has established an **independent committee** to maintain and safeguard the impartiality of its certification activities. The main task of this committee is to monitor that control and certification activities are conducted independently, in accordance with impartiality principles, objectively, and consistently. The results are reported, and recommendations are made accordingly.

All managers, employees, and members of the impartiality committee sign the Declaration of Impartiality and Confidentiality **annually**.

14.2. Objections and Complaints

- **Objection:** If an operator does not agree with a certification decision, sanctions, or the rejection of an application, they can file an objection.
- **Complaint:** Complaints regarding Başak Ekolojik's services, such as failure to respond to correspondence related to certification or unprofessional conduct.

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Page No	17 / 19		

The **P-06 Appeals and Complaint Procedure** and the **F-P06.01 Appeal And Complaint Notification Form** are available on our website in up-to-date versions. Operators with objections or complaints can fill out the relevant form and submit it to Başak Ekolojik.

Başak Ekolojik ensures that all stages from the objection/complaint to the final decision are recorded in a traceable manner using the **F-P06.01 Appeal And Complaint Notification Form**. Objections/complaints are handled within five (5) working days and resolved at the latest within 15 days.

If the decision resulting from the objection/complaint is subject to an appeal by the operator, the Head of Başak Ekolojik convenes an Objection and Complaint Committee to review the case.

Where deemed necessary, the Organizations responsible for the review of objections are specified in the Organic Farming Control and Certification Service Contract in case of appeals.

If an operator wishes to object to Başak Ekolojik's certification decision, pursuant to TR Organic Farming Regulation, **Article 41 (1)(g)**, they have the right to submit relevant information and documents to the Organic Farming Committee within a maximum of twenty-one (21) days. The Ministry has the authority to review the case and request additional documents. After review, the Ministry issues a final decision and communicates it to the parties.

In accordance with the certification standard, Başak Ekolojik reports all objections and complaints to the Turkish Accreditation Agency (TÜRKAK), which accredits Başak Ekolojik.

14.3. Changes in Control and Certification System

All changes arising from Turkish and EU Organic Farming Regulations are announced in the Announcements section of Başak Ekolojik's website, and written information is also sent via email to operators. The relevant information, links, and/or documents are specified on the website and in emails.

It is the operator's responsibility to visit the website, receive announcements, and monitor **emails**.

14.4. Sharing Information with the European Commission and Control Bodies

- In accordance with **(EU) 2021/1698, Article 21**, Başak Ekolojik will immediately share information regarding any suspicion of non-compliance affecting the integrity of organic products with the European Commission and other control organizations.
- Additionally, if the European Commission reports suspected or identified non-compliances that affect the integrity of imported organic products, Başak Ekolojik will conduct investigations in accordance with **(EU) 2021/1698, Article 22**. Başak Ekolojik will inform the Commission using the template specified in **Annex III of (EU) 2021/1698**. From the moment this notification reaches Başak Ekolojik, it will respond within **30 calendar days**, providing the results of the investigation, actions taken, measures implemented, and any other relevant information.
- In cases where operators or group operators are subject to traceability and mass balance controls, Başak Ekolojik shares the relevant information needed to finalize these controls.
- If an operator or group operator and/or contractual operation changes its control body, the new control body requests the control files of the relevant operator/group operator from the previous control body within **30 days**. The new control body ensures that the previous control body provides the information specified in **(EU) 2021/1698, Article 10(3)**.

Document No	RH-01	Prepared by	Checked and Approved by
Release Date	03.11.2021	Betül Aslan	Asaf Özkan
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Page No	18 / 19		

15. DISTRIBUTION

The electronic version of this document is accessible to all personnel via the Başak Ekolojik Corporate Portal System (SharePoint).

16. REVISION HISTORY

Revision No	Related Article	Revision	Revision Date
02	General	Adjustments have been made according to the new EU organic production Regulation with number (EU)2018/848 and Chapter II has been added.	17.03.2023
03	General	In accordance with the new EU Organic Production Regulation (EU) 2018/848, the guideline has been revised: Section 2 has been removed, and the content has been consolidated into a single section, addressing both the Turkish and EU regulations while highlighting the differences between them. As part of the corrective and preventive actions in line with recommendations of the EU Commission audit, the following statement has been added: “... It is requested that the OSP be completed and submitted at least 10 working days prior to the planned inspection date. ... If the OSP is incomplete or not submitted on time, the inspection plan cannot be executed, and the operator will be informed to complete the OSP and submit the mandatory minimum annexes.”	13.01.2025

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Page No	19 / 19		