

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

Inspection 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 .

Inspection 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;

- 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.

Mass catering operations carried out by a mass caterer as defined in point (d) of Article 2(2) of Regulation (EU) No 1169/2011 are not subject to this Regulation except as set out in this paragraph. National rules or, in the absence thereof, private standards may be applied on the production, labelling and control of products originating from mass catering operations. The organic production logo of the European Union shall not be used in the labelling, the presentation or the advertising of such products, and shall not be used to advertise the mass caterer.

Definitions:

‘Preventive measures’ means measures that are to be taken by operators *at every stage of production, preparation and distribution* in order to ensure the preservation of biodiversity and soil quality, measures for the prevention and control of pests and diseases and measures that are to be taken to avoid negative effects on the environment, animal health and plant health;

‘Precautionary measures’ means measures that are to be taken by operators *at every stage of production, preparation, and distribution* to avoid contamination with products or substances that are not authorised for use in organic production in accordance with the Regulation (EU)2018/848, and to avoid the commingling of organic products with non-organic products;

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‘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;

‘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;

‘Commission Implementing Regulation’ The specific rules set by the European Commission which are limited in scope and aim to ensure uniform application of EU legislation;

‘Commission 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’ It refers to a naturally occurring event of a biotic or abiotic nature that leads to significant disruptions in agricultural production systems or forest structures, ultimately causing substantial economic damage in the farming or forestry sectors;

‘Catastrophic event’ It refers to an unforeseen event of a biotic or abiotic nature caused by human activity that leads to significant degradation in agricultural production systems or forest structures, ultimately resulting in substantial economic damage in the farming or forestry sectors;

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‘OFIS’ The European Organic Information System;

‘**integrity of organic or in-conversion products**’, means the fact that the product does not exhibit non-compliance which in any stage of production, preparation and distribution affects the organic or in-conversion characteristics of the product or is repetitive or intentional.

2. APPLICATION PROCESS

2.1 Application Review

The applicant submits the information on the [Application Form](#), available from Başak Ekolojik’s office or website (www.basakekolojik.com.tr), along with the requested supporting documents. Başak Ekolojik reviews the applicant's ability to meet key requirements and assesses its own capacity.

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 Offer and Signature

Pricing is determined in accordance with the [Organic Agriculture Control and Certification Pricing Instruction](#) by evaluating the scope of the requested certificate, the frequency and duration of the necessary inspections, and other certification-related factors. The cost of the inspection and certification service is then communicated to the applicant via a [Price Offer Form](#), in line with the relevant instruction.

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2.3 Contract Signature

An operator wishing to engage in organic farming activities enters into an agreement with Başak Ekolojik. Upon approving the **Price Offer Form**, the operator is provided with the **Organic Agriculture Control and Certification Service Agreement**, which has been prepared in accordance with legal regulations. The operator signs the agreement within a maximum of 30 days of approving the quotation and returns a copy bearing an original signature to Başak Ekolojik for filing.

– The Organic Farming Control and Certification Service Agreement shall include the following undertakings by operators or group of operators in accordance with Article 10(1)(d) of Regulation (EU) 2021/1698.

- Granting access to all production units, facilities, accounts, and related supporting documents for inspection purposes to the control authority and Başak Ekolojik;
- To provide Başak Ekolojik—and, where necessary, the control authority—with any information required for inspection purposes;
- To submit the results of their own quality assurance programs upon the request of the control authority or Başak Ekolojik;
- Where the suspicions of non-compliance are confirmed, or where such suspicions cannot be eliminated or non-compliances affecting product integrity are detected, to notify product buyers of this situation in writing and without delay, and to transmit the relevant information to Başak Ekolojik and, where necessary, to the control authority;
- In the event of a change of control authority or control body, agreeing to the transfer of the control file, or—in the case of withdrawal from organic production—agreeing to the retention of the file for 5 years by the last control authority or control body;
- In the event of withdrawing from organic production, immediately notify Başak Ekolojik and, where necessary, the control authority;
- Accepting to the sharing of information among the various control bodies in the event that contractors or subcontractors of group contractors are inspected by such bodies;
- Carry out activities in accordance with organic production rules;
- Implementing corrective measures as determined by the control body and authority in case of non-compliance.

– In accordance with (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

In addition to the information provided in the application form and the accompanying documents, the contracted operator is required to complete an Organic System Plan (OSP)—tailored to their specific field of activity and containing

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a comprehensive description of their production units—and submit it to Başak Ekolojik at least 10 working days prior to the scheduled inspection date. Upon receipt, Başak Ekolojik evaluates the OSP before the inspection takes place to verify that all information regarding every stage of production is complete and that the minimum mandatory attachments have been submitted. If the OSP is incomplete or not submitted on time, the inspection cannot proceed, and the operator is notified to complete the OSP and submit the required attachments.

In accordance with Article 9(2) of (EU) 2021/1698; To verify compliance with Regulation (EU) 2018/848, inspections in third countries are carried out by Başak Ekolojik on all operators and groups of operators—regularly, on a risk-based approach, and at appropriate frequencies throughout the production, preparation, and distribution stages—based on the likelihood of non-compliance determined by taking into account the following elements detailed in the Organic System Plan (OSP):

- a) type, size, and structure of the operator and group of operators—including newly added land parcels—as well as the number of new members joining the group of operator;
- b) the location and complexity of the activities or operations of the operator and group of operators;
- c) the duration for which the operator and group of operators have been involved in organic production, preparation, and distribution;
- d) in the case of a group of operators, the results of internal audits carried out in accordance with the system's documented procedures for the internal controls of the group of operators;
- e) whether the operator includes non-organic or in-conversion production units;
- f) type, quantity, and value of the products;
- g) risk of mixing of products or contamination with unauthorized products or substances;
- h) derogasyon uygulamaları veya müteşebbis ya da grup müteşebbislerin kural istisnaları;
- i) critical points for non-compliance at every stage of production, preparation, and distribution;
- j) subcontracting activities;
- k) whether the operator or group of operators has changed its control body;
- l) Any information that might indicate non-compliance with Regulation (EU) 2018/848.

In accordance with Article 10 of (EU) 2021/1698; prior to the assumption of control by the operator or group of operators, Başak Ekolojik ensures that the operator or group of operators has obtained the following information via the OSP.:

- Detailed descriptions of the organic and/or in-conversion production unit and, where applicable, of non-organic production units and of the activities to be carried out in accordance with Regulation (EU) 2018/848;
- Relevant measures to be taken at the level of organic and/or in-conversion units and/or facilities and/or activities to ensure compliance with Regulation (EU) 2018/848;

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- Measures to be taken to reduce the risk of contamination arising from unauthorized products or substances, and cleaning measures to be implemented during the production, preparation, and distribution stages.

In addition;

1. When an operator or group of operators needs to use fertilizers and soil conditioners, in addition to listing these inputs in the OSP, they must complete the "**Application Form for the Approval of Non-Farmyard Fertilizers, Soil Conditioners, and Nutrients**" and submit it to Başak Ekolojik. Başak Ekolojik will evaluate the input in accordance with Implementing Regulation (EU) 2021/1165 and the Turkish Organic Agriculture Regulation.

2. When an operator or a group of operators needs to use plant protection inputs, in addition to listing these inputs in the OSP, they must complete the "**Application Form for the Approval of Plant Protection Inputs**" and submit it to Başak Ekolojik. Başak Ekolojik will evaluate the input in accordance with Implementing Regulation (EU) 2021/1165 and the Turkish Organic Agriculture Regulation.

3. Implementing Regulation (EU) 2021/1165 serves as a key reference for reviewing non-farm plant protection and fertilizer inputs, as well as cleaning and disinfection products, food additives, processing aids, and non-organic agricultural ingredients.

4. OPERATOR RISK ASSESSMENT

A risk assessment of the operator is conducted annually, utilizing information obtained through the application process and the evaluation of OSP (Operator System Plan) data. Başak Ekolojik evaluates the product and the operator separately, taking into account the **Operator Risk Analysis Instruction** it has developed in accordance with the relevant regulations.

5. HIGH-RISK PRODUCTS

In accordance with Articles 8, 12, and 16 of Regulation (EU) 2021/1698, regarding high-risk products originating from third countries that are listed or notified by the European Commission, Başak Ekolojik;

- At least two physical on-site inspections per year are conducted for the operator and group of operators. One of these physical on-site inspections is carried out without prior notice.

- In addition to the sampling rate determined in accordance with Başak Ekolojik's own risk analysis procedure, at least one sample of the crop is collected from the field annually. Based on Başak Ekolojik's assessment, the sample is taken at the most appropriate time to detect any potential use of prohibited substances. For operators who do not cultivate crops, samples are taken from raw materials, intermediate products, or processed products arriving at the facility.

- It conducts systematic physical inspections and takes at least one representative sample from the consignment to be imported into the European Union, taking into account the sampling percentages defined in the information currently shared by the European Commission regarding high-risk products. Furthermore, Başak Ekolojik shall possess complete traceability documentation for the products—including invoices—relating to the operators or group of operators. Upon

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the Commission's request, Başak Ekolojik transmits this traceability documentation and the sample analysis results to the importer's control body and to the competent authority of the Member State where the consignment is verified.

Başak Ekolojik monitors updates to Regulation (EU) 2021/1698 and conducts its verifications by taking the relevant changes into account.

6. INSPECTION PROCESS

6.1 Planning and Preparation of the Inspection

Following the risk assessments of the operators, an inspection plan covering the entire year is prepared. In accordance with the Turkish Regulation and Article 9 of Regulation (EU) 2021/1698, a verification of compliance with the Turkish Regulation and/or Regulation (EU) 2018/848—based on the scope of the contract—shall be conducted at least once a year for all operators and group of operators. This compliance verification shall include a physical on-site inspection.

Estimated start and end dates for inspections and the number of inspection days are calculated. When developing the plan, the rule that an inspector may inspect the same operator for a maximum of three consecutive years is taken into account. Based on the risk assessment and the number of inspection days stipulated in the contract, the number of producers to be effectively inspected per day is determined, alongside the scheduling of announced or unannounced inspections.

- Based on the outcome of the risk analysis assessment, Başak Ekolojik implements the following requirements within its inspection planning;

- Selecting operators for unannounced inspections and visits based on risk analysis and scheduling them according to their risk level
- Conducting additional random inspection visits for at least 10% of contracted operators, in accordance with their risk category
- Ensuring that at least 10% of all inspections and visits conducted are unannounced
- Based on a general assessment of the risk of non-compliance with organic production rules—covering all stages of production, preparation, and distribution—taking samples from at least 5% of the operators under supervision annually, with 2% of these samples collected during unannounced inspections
- Inspections carried out as follow-ups to suspected or detected non-compliance are not included in the minimum percentage calculations for additional inspections
- Re-inspecting (conducting external inspections of) at least 5% of group of operator members annually, ensuring a minimum of 10 members are inspected; where the group operator has 10 or fewer members, all members are re-inspected (subject to external inspection).

6.2 Performing the Inspection

The Başak Ekolojik inspector is informed of inspections via the annual inspection plan and receives an inspection assignment. The inspection is conducted either by notifying the operator—in accordance with the inspection type

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specified in the annual plan and the assignment—or without prior notice (unannounced). The inspection activity is carried out with the operator registered in the application and signatory to the contract, or with a person formally authorized by the operator via power of attorney. During the inspection, the inspector completes the inspection report appropriate for the operator's activities. Following the inspection, the inspector delivers a copy of the report to the operator, bearing the signatures of both the inspector and the operator.

Physical Inspection / Follow-up Inspection

Based on the operator's risk assessment, if a physical inspection is required prior to the issuance of a Certificate of Inspection (COI) or product certificate, or in the event of suspected or confirmed significant non-compliances during the certification process, Başak Ekolojik conducts a physical inspection—including a physical inspection of the operator's consignment and verification of documents—prior to issuing the certificate, in order to ensure the integrity of the organic products and compliance with relevant regulations.

A follow-up inspection of the operator may be mandated to address recurring non-compliances by requiring the operator to increase inspection frequency within their quality assurance system, improve procedures established to safeguard organic product integrity, or allow for on-site verification that labels on a product with a cancelled certification have been corrected and the product removed from the organic product storage area.

EU Regulation on the Structure, Composition, and Inspection of Group of Operators

- Matters such as the formation of the group of operators, the documented procedures required for the internal control system (ICS), the duties of the ICS manager and controllers, the content of member agreements, and the circumstances under which the group of operator's certificate may be withdrawn by the control body are specified in Article 36 of Regulation (EU) 2018/848.

- The composition and size of a group of operators are specified in Article 4 of (EU) 2021/279:

- A group of operator registers with only one group of operator for a specific product, even in cases where the group of operator engages in different activities related to the product;
- The maximum size of a group of operator may be 2.000 members.

- Pursuant to Article 5 of (EU) 2021/279, Group of Operators shall maintain the following documents and records for the purposes of the internal control system (ICS):

- List of group member;
- Membership agreements signed between the group of operator and the member (as a legal entity), outlining the member's rights and responsibilities;
- Internal control reports signed by the ICS controller and the group of operator's audited member;
- Training records of ICS controllers;
- Training records of group members;

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- Records of measures taken in the event of non-compliance identified by the ICS manager;
- Traceability records, including information regarding quantities;
- Written agreements and contracts between the operator and subcontractors, including information on the nature of subcontracting activities;
- Appointments of the ICS manager and inspectors.

- In accordance with Article 6 of (EU) 2021/279,

the ICS manager shall immediately notify Başak Ekolojik of the following information:

- Any suspicion of a major and critical non-compliance;
- Suspension or withdrawal of a member, a production unit, or facilities—including purchasing and collection centers—from the group;
- Prohibition on placing a product on the market as organic or in-conversion, including the name of the relevant member(s), the quantities involved, and lot identifications.

- In accordance with Article 2 of Regulation (EU) 2021/771:

- Başak Ekolojik assigns competent inspectors to evaluate the Internal Control Systems (ICS) in order to verify and confirm the compliance of a group of operators;
- The establishment, operation, and maintenance of the group of operator's Internal Control System are evaluated;
- The Başak Ekolojik inspector assesses the risks associated with the group of operator to select members for external inspection. In doing so, the inspector considers the volume and value of production, the likelihood of non-compliance with (EU) 2018/848 requirements, and the risk assessment previously conducted by the Başak Ekolojik certifier for the group of operator. External inspections are carried out physically on-site, with the selected members present. Sampling is performed following the review of the Internal Control System.
- In accordance with Article 9(7) of (EU) 2021/1698, Başak Ekolojik re-inspects at least 5% of the members annually, subject to a minimum of 10 members. If the group of operator has 10 or fewer members, all members are re-inspected.
- Başak Ekolojik allocates sufficient time for the inspection of a group of operator. Başak Ekolojik spends a minimum of one day inspecting the Internal Control System. The number of days increases depending on the size and complexity of the ICS.
- To verify the competence and knowledge of the ICS inspectors, Başak Ekolojik conducts witness inspections on a number of internal inspectors equal to the square root of the total number of internal inspectors.

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

In accordance with Article 16 of Regulation (EU) 2021/1698, Başak Ekolojik verifies consignments intended for import into the European Union for compliance with the basic Regulation (EU) 2018/848 and the delegated Regulation (EU) 2021/1698. This verification may include systematic document checks, as well as physical inspections and sampling based on risk assessment, prior to the consignment leaving the third country of export or the country of origin.

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In accordance with the **Sampling Procedure** under Turkish and EU Regulations, and based on the results of the risk assessment specified under heading No. 4, Başak Ekolojik collects samples for analysis at the most appropriate times to verify compliance at critical control points. The selection of operators and group of operators to be sampled will be based on a risk assessment—which includes the likelihood of non-compliance with organic production rules—taking into account all stages of production, preparation, and distribution.

During inspections for sample collection, factors such as organic production rules, the identification of non-compliant production techniques, or suspected use of unauthorized substances are also taken into account.

In accordance with Turkish and EU Regulations, Başak Ekolojik collects samples from at least 5% of the total number of operators under its supervision—with 2% of the samples obtained through unannounced inspections. In the case of group of operators, samples are taken from at least 2% of the members of each group.

Details of samples collected by Başak Ekolojik inspectors are recorded on a ‘Sample Collection Form,’ which is signed by both parties, and a copy is provided to the operator. Before sending the samples to the laboratory for analysis, Başak Ekolojik contacts the operator to provide information regarding the subcontracted laboratories with which it has an agreement. Pursuant to Article 12(7) of Regulation (EU) 2021/1698, control bodies may delegate sampling activities to a control body recognized by the European Commission under Article 46(1) of Regulation (EU) 2018/848, or to a laboratory accredited according to ISO/IEC 17025 ("General requirements for the competence of testing and calibration laboratories").

Written Records of Inspections

Written records may be in paper or electronic form. Başak Ekolojik retains these records for a period of 5 years from the date the certification decision is made. These records include, in particular, the following:

- A description of the purpose of the inspections;
- The inspection methods and techniques applied;
- Inspection outputs, including the results of the verification of the elements examined during the inspection and details such as sampling; and
- Actions required to be taken by the relevant operator or group of operator as a result of the inspections conducted by Başak Ekolojik, including the deadline for such actions.

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

6.3 Non-Compliances and Sanction Catalogues

Non-Compliances

Başak Ekolojik classifies practices that contravene the principles of the Turkish Regulation on Organic Agriculture as non-compliances. In summary, the sanction categories for this section can be viewed in the “Catalogue of Measures” table below.

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In accordance with Article 22 of EU Regulation (EU) 2021/1698, Başak Ekolojik has developed a general catalog of measures to be taken in the event of a detected non-compliance. This catalog of measures covers the following:

- a. List of non-compliances referring to the specific rules of Regulation (EU) 2018/848 or of the delegated or implementing Regulations adopted pursuant to that Regulation.
- b. Classification of non-compliances into three categories—minor, major, and critical—considering at least the following criteria:
 - i. Implementation of precautionary measures, practical actions, and the reliability of the operator's or group of operator's own controls;
 - ii. Impact on the integrity of products in organic or conversion status;
 - iii. 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;
 - iv. The response provided by the operator or group operator to previous requests from Basak Ekolojik.
- c. The measures to be applied for each non-compliance.

Catalogue of Measures		
Category of non-compliance	Conditions	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 sold with reference to organic production.	The action plan on the correction of the non-compliance(s) must be submitted by the operator/group of operators within two (2) months.

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Majör	the case of non-compliance is major when: - 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; - the non-compliance affects the integrity of the organic or in-conversion product; - the operator/group of operator did not correct in a timely manner a minor non-compliance or previously identified minor deficiencies are recurring; - the traceability can locate the affected product(s) in the supply chain and the product can be prevented from being sold with reference to organic production.	An action plan for correcting non-compliances and, where necessary (e.g., when references to organic farming are removed from products), evidence of such correction must be submitted by the operator/group of operators within one (1) month. Measures notified to the operator/group of operators as part of the certification decision take effect immediately. These potential measures include: - Refraining from making any reference to organic production on the labels and in the advertising of the entire batch or production run - Prohibiting the operator/group of operators from marketing their products with reference to organic production for a specified period - Implementing a new conversion period - Limitation of the scope of the certification - Improving the precautionary measures and controls implemented by the operator/group of operators to ensure compliance
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 sold with reference to organic production.	The action plan for correcting non-compliances and, where necessary, evidence of such correction (e.g., removal of references to organic farming from products) must be submitted by the operator/group of operators within one (1) month. Measures notified to the operator/group of operators alongside the certification decision take effect immediately. These potential measures include: - Refraining from making references to organic production on the labels and in the advertising of the entire batch or production run - Prohibiting the operator/group of operators from marketing their products with references to organic production for a specified period; suspension or withdrawal of certification - Implementation of a new conversion period - Limitation of the scope of certification - Suspension of the certificate

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The operator may appeal to certification decisions in writing within 14 days at the latest. In such cases, the process is conducted in accordance with the [Appeal and Complaint Procedure](#), which is also published on our website.

7. TRANSFERRING THE OPERATOR FROM OTHER INSPECTION AND CERTIFICATION BODIES

In the event of a change of control body, the control bodies share the control file—containing the information and documents held under their respective control systems—with the new control body; in the case of Regulation (EU) 2018/848, this sharing must take place within 30 days. In cases where member producers are transferred from a group of operator, the member producer's control file must be shared in its entirety, including the relevant information and documents pertaining to the group of operator.

Başak Ekolojik submits a formal notification to the previous control body requesting the control file. In this notification, it requests the control file containing, at a minimum, the following information and documents:

- Of the operator, for the last 3 years;
 - Inspection reports
 - the list of non-compliances and the measures put in place to address them, and the fact that all non-compliances were addressed
 - Certification decisions
 - OFIS notifications and inspection details
 - Details regarding the operator's residue status and actions taken in relation to it
 - Limitation of scope/suspension/withdrawal
 - derogations granted or requests for derogation being processed by the previous control body
- Master/Operator Certificates and any attachments—such as product, land, and producer lists—(covering the harvest/production years of products currently in stock)
- Approved stock report (including details such as scope, origin, producer code, harvest year, lot number, and warehouse name)
- Analysis reports for the reported stock, if available
- For high-risk products subject to current "additional control measures" notified/listed by the European Union: control reports, mandatory sample analysis results, and traceability documents detailing the financial and physical flow throughout the entire process from production to sale
- In the case of the Regulation on the Principles and Implementation of Organic Agriculture: proof that the producer(s) and the parcel(s) subject to certification have been removed from the TBS (Agricultural Information System of the Republic of Turkish Ministry of Agriculture and Forestry).

8. CERTIFICATION PROCESS

Operators and group of operators cannot place their products on the market as organic products or products in the process of conversion unless they hold a certificate.

Certification is the process of evaluating and documenting the operator and the stage the product has reached, following the implementation of all control measures. The certifier's evaluation begins after the control file (inspection report and its annexes) has been submitted to the certifier.

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In accordance with Başak Ekolojik's relevant procedures, the certifier reviews the inspection file within 30 days and completes the certification process within 45 days. This timeframe may be extended depending on the inspection results and the conditions of the evaluation process.

The certifier notifies the operator of the certification decision via a Certification Decision Notification. If the operator meets the requirements set forth in the relevant legislation and Başak Ekolojik's applicable standards and procedures, the certifier issues a certificate to the operator following the annual inspection and certification process. Only Başak Ekolojik certifiers prepare and sign the operator's certificate.

An operator certificate indicating the conformity of the controlled activity with the Turkish Organic Farming Regulation is an "Organic Farming Operator Certificate" and includes the information specified in Annex 11 of the Turkish Regulation. It is prepared in Turkish. Certificate details are entered into the TBS system within 45 days at the latest.

The documentary evidence attesting to the compliance of the controlled activity with EU Regulation 2018/848—specifically the "Certificate for operators, groups of operators and exporters in third countries for products to be imported into the European Union as organic products or in-conversion products"—is issued in electronic form in English using the Trade Control and Expert System (TRACES).

The date on which the certifier completes the assessment and issues the certification decision is the certificate's "Date of Issue." Under Turkish Regulations, the certificate's expiration date is 12 months from the date of issue; the 12-month period following the date of issue constitutes the "Certificate Validity Period." Under EU regulations, the certificate's expiration date is 15 months from the date of issue; the 15-month period following the date of issue constitutes the "Certificate Validity Period." Operators who have been issued a certificate are listed on our website in the "Başak Ekolojik Current Operator List."

The certificate is updated whenever changes occur regarding the data it contains.

In accordance with Article 10(3) of (EU) 2021/1698, if the previous control body of the operator or group of operators fails to transmit the necessary information to Başak Ekolojik, or if there are doubts regarding the information provided, Başak Ekolojik shall not issue certificates to the operators or group of operators until such doubts have been resolved.

Product Certification

Regarding product certification under the Turkish Organic Agriculture Regulation, the Product Certificate and Wholesale Product Certificate are issued in Turkish. For the EU Organic Agriculture Regulation, a Transaction Certificate is prepared for non-EU buyers, and a Certificate of Inspection (COI) is prepared for EU-based buyers in English via the TRACES system. Under the Turkish Regulation, individual product certificates are not issued to producers who are members of a producer group; instead, the product certificate is issued to the group's lead operator, with the producer group member's codes listed as the source on the certificate.

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The operator submits an application to the Başak Ekolojik certification unit, including the COI-NOPICTC-Product Certificate Request Form and the required supporting documents. If the application review yields a positive result, the product certificate and the TC are forwarded to the operator via cargo or e-mail, and the product certificate details—prepared in accordance with Turkish regulations—are entered into the TBS system. The COI Certificate is prepared on TRACES and approved electronically.

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

Pursuant to Article 22 of (EU) 2021/1698; in addition to the measures referred to in Article 29(1), (2), and (3) of (EU) 2018/848 and Article 2 of Implementing Regulation (EU) 2021/279, when Başak Ekolojik receives verified information—including information from other control bodies—indicating an intention to import a product from a third country that bears terms referring to organic production but may not comply with Regulation (EU) 2018/848, or when it suspects such a case, or in situations where a control authority or control body is informed by an operator of a suspected non-compliance; Başak Ekolojik

- conducts an immediate investigation to verify compliance with Regulation (EU) 2018/848 or with the delegated or implementing acts adopted pursuant thereto;
- prohibits the importation of the relevant product from a third country for the purpose of placing it on the market within the Union as an organic product or a product in conversion until the investigation is concluded.

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

In accordance with Article 23 of (EU) 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 through the use of unauthorized products, substances, or techniques, or mixing with non-organic products—

Başak Ekolojik ensures that no reference is made to organic production in the labeling and advertising of the entire lot or production run intended for placing on the Union market as a product imported from a third country.

Başak Ekolojik, where the non-compliance was detected:

- takes all necessary actions to identify the source of the non-compliance and determine the responsibilities of the operator and the group of operators, and
- takes appropriate measures to ensure that the operator and the group of operators correct the non-compliance and prevent the recurrence of such non-compliances.

9. SUSPENSION OF THE CERTIFICATION

It is the invalidation of the certification, in whole or in part, for a specific period of time upon the detection of one or more critical or serious, recurring or ongoing non-compliances, until the necessary corrective actions are fulfilled by the operator and verified.

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In the case of partial suspension, an operator certificate is issued for the products, activities, and units unaffected by the suspension decision, while the products, activities, and units affected by the suspension decision are removed from the certificate. If the suspension decision covers all products, activities, and units, the current certificate is invalid, and no new certificate shall be issued until the decision to resume certification is made.

The certifier informs the operator in writing via the [Certificate Decision Notification Form](#) (either by email or mail) regarding the suspension of certification, the reasons and consequences of this decision, the conditions for the continuation of certification, and the rights of appeal. Following the notification of the suspension decision to the operator, the operator shall immediately cease the use of Başak Ekolojik and organic production/agriculture logos, as well as any other indications reflecting that the relevant products and/or scopes are certified. This scope also includes advertisements, as well as logos and trademarks used within the enterprise(s). During the suspension period, the operator cannot offer the suspended products for sale with any reference to organic, nor can they make any reference to the certification. Throughout the suspension, the relevant operator/product/unit is designated as 'suspended' in the Operator List, which is continuously kept up to date and published on Başak Ekolojik's website.

The obligation for the annual mandatory inspection continues during the suspension period. In cases where the request for termination of certification requires the withdrawal of the certification at the end of the suspension process, the request shall not be processed until the process is finalized (before the certification is withdrawn).

10. WITHDRAWAL OF CERTIFICATION

It is the permanent termination of the certification upon the detection of a critical or serious, recurring or ongoing non-compliance. Before making a decision to withdraw the certification, the certifier suspends the certification and grants the operator the opportunity and time to submit their corrective actions and/or explanations. This period cannot exceed 6 months. If the corrective action(s) and/or explanation provided by the operator within the given timeframe are found to be sufficient, it may be decided to resume the certification under specified conditions (e.g., reduction of the scope of certification, additional controls, sampling). Otherwise, it is decided to withdraw the certification.

The withdrawal of certification is not applied partially; it covers all products, units, and activities of the operator. The withdrawal of certification results in the automatic termination of the control and certification service agreement. Products produced and certified prior to the withdrawal date cannot be offered for sale with any reference to organic after the withdrawal, nor can any reference be made to the certification.

The certifier informs the operator in writing via the [Certificate Decision Notification Form](#) (either by email or mail) regarding the withdrawal of certification, the reasons and consequences of this decision, and the rights of appeal. Following the notification of the withdrawal decision to the operator, the operator shall immediately cease the use of Başak Ekolojik and organic production/agriculture logos, as well as any other indications reflecting that the relevant products and/or scopes are certified. This scope also includes advertisements, as well as logos and trademarks used within the enterprise(s).

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The operator whose certification has been withdrawn is removed from the [Current Operator List](#) and registered in the [Sanction and Termination List](#), which is continuously kept up to date and published on Başak Ekolojik's website. Operators whose certificates have been withdrawn shall remain on this list for 5 years.

11. TERMINATION/REJECTION OF CERTIFICATION, EXTENSION/REDUCTION OF CERTIFICATION SCOPE

The operator may request the termination of certification procedures in writing at any time due to withdrawing from organic farming activities or changing the certification body, provided that they comply with the [Organic Farming Control and Certification Service Agreement](#). In cases of non-compliance with the organic farming control and certification service agreement other than violations of organic farming rules (such as difficulties in cooperation, financial conditions, etc.), Başak Ekolojik may also unilaterally terminate the contract.

The contract cannot be terminated before the necessary requirements are fulfilled if there is an ongoing investigation, a non-compliance requiring the withdrawal of certification, an unresolved OFIS case, or a stock belonging to the operator planned to be offered for sale as organic. In such a case, the operator is informed about the process in writing or via e-mail.

If there is no obstacle to the termination of certification, the operator is informed via the [Notification Form for Agreement Termination and Termination of Certification](#).

Following the notification of the termination decision to the operator, the operator shall immediately cease the use of Başak Ekolojik and organic production/agriculture logos, as well as any other indications reflecting that the relevant products and/or scopes are certified. This scope also includes advertisements, as well as logos and trademarks used within the enterprise(s).

Başak Ekolojik removes the operator whose certification has been terminated from the list of certified companies and registers them in the [Sanction and Termination List](#).

The operator may request the extension or limitation of the certification scope; however, in accordance with the terms of the Organic Farming Control and Certification Service Agreement, they are obliged to inform Başak Ekolojik via a new application form in the event of any change regarding their certified products or processes. Başak Ekolojik certifier evaluates the requested scope extension or limitation, requests the relevant operator profile/OSP to be updated and re-submitted accordingly, and, if necessary (e.g., if a new technology is to be used in the facility, a new warehouse is introduced, or for land; a new plot of land, a new warehouse, an agreement with an intermediary trader, etc.), requests an inspection to be scheduled by the inspection unit and carries out the evaluation. The certifier then notifies the operator of the certification decision and lists any non-compliances, if applicable, via the Certificate Decision Notification, and updates the operator's certificate if deemed appropriate.

Upon the detection of a critical or serious, recurring or ongoing non-compliance, the certifier may decide to permanently remove the products, activities, or units within the scope of certification from the certification scope (limitation of the certification scope). An operator certificate is issued for the products, activities, and units unaffected by the decision,

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while the products, activities, and units affected by the decision are removed from the certificate. The part removed from the scope cannot be re-included into the scope prior to a new control and certification process. The certifier informs the operator in writing via the [Certificate Decision Notification Form](#) (either by email or mail) regarding the limitation of the certification scope, the reasons and consequences of this decision, and the rights of appeal. Following the notification of the decision to limit the certification scope to the operator, the operator shall immediately cease the use of Başak Ekolojik and organic production/agriculture logos, as well as any other indications reflecting that the relevant products and/or scopes are certified. This scope also includes advertisements, as well as logos and trademarks used within the enterprise(s).

The operator whose certification scope has been limited is registered in the [Sanction and Termination List](#), which is continuously kept up to date and published on Başak Ekolojik's website.

For operators, products, activities, or units whose certification has not yet been realized by Başak Ekolojik, a decision to deny certification (refusal of certification) may be issued by the certifier upon the detection of major or critical non-compliances, depending on the inspection results and the certification decision, until the necessary corrective actions are fulfilled by the operator and verified. The certifier informs the operator in writing via the [Certificate Decision Notification Form](#) (either by email or mail) regarding the denial of certification, the reasons and consequences of this decision, and the rights of appeal. The operator notified of the denial of certification is registered in the [Başak Ekolojik Sanction and Termination List](#), which is continuously kept up to date and published on Başak Ekolojik's website.

12. USE OF THE CERTIFICATE AND LOGO

The principles for using issued certificates and Organic Product, Başak Ekolojik, and Accreditation Body Logos are determined by the [Certificate and Logo Usage Instructions](#) published on our website. Regarding the use of Certificates and Logos according to Turkish regulations, the principles given in the Fifth Section and Annex 10 of the Regulation on the Principles and Implementation of Organic Agriculture apply. Logo usage according to the EU Regulation is carried out in accordance with the [Instructions on the Use of the EU Logo](#), which is also published on our website.

13. EXCEPTIONS

13.1. Retroactive Recognition of Conversion Period

Conversion period: It refers to the period from the commencement of activities in accordance with the provisions of the Relevant Regulation (from the moment the producer notifies the control body of their activity) until the product is certified as organic.

Operators may apply to Başak Ekolojik for requests for retroactive recognition of the conversion period by providing evidence that their land parcels are natural or agricultural areas and have not been treated with products or substances not authorized for use in organic production.

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Operators are required to submit their applications—using either the "**Retroactive Recognition Application Form**" (in accordance with the Turkish Regulation) or the "**Application Form for the Retroactive Recognition of the Conversion Period**" (in accordance with the EU Regulation)—before cultivation activities commence.

The conversion period may be retroactively recognised if there is satisfactory and realistic evidence—based on risk analysis, physical inspection results, analysis findings, and other observations—demonstrating that organic farming requirements have been met over a specific period. Inspections of the relevant land areas are conducted by Başak Ekolojik prior to land cultivation, and the inspection activities carried out for this purpose are documented in reports.

- Başak Ekolojik shall immediately inform the European Commission and the accreditation body (TÜRKAK) of any retroactive recognition approval granted in accordance with the EU Regulation.
- Operators are required to retain documentary evidence regarding retroactive recognition and documentary evidence concerning the use of the land parcels covered by this recognition for a period of 5 years.

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

- In accordance with point 1.8.1 of Part I of Annex II to Regulation (EU) 2018/848, only organic plant reproductive material may be used for the production of plants and plant products other than plant reproductive material.
- However, as an exception to 1.8.1 and in accordance with 1.8.5.2, operators in third countries may use plant reproductive material in conversion status when they provide justification that organic plant reproductive material is not available in sufficient quality or quantity within the territory of the third country where the operator is located.
- Under the specific conditions set out in (EU) 2018/848, where plant reproductive material with organic or in-conversion status—or organic plant reproductive material produced in accordance with (EU) 2018/848—is not available in sufficient quality or quantity within the territory of the third country where the operator is located, control bodies recognized pursuant to Article 46(1) of Regulation (EU) 2018/848 may authorize operators in third countries to use non-organic plant reproductive material in an organic production unit.
- In accordance with Article 25 of (EU) 2021/1698, Başak Ekolojik evaluates the information, prepares a justification for each derogation granted, and includes the relevant information in the annual report to be submitted to the European Commission.
- *Derogations regarding organic plant propagation material will expire on December 31, 2036.*

According to Turkish Regulation, if operators are unable to source organic seeds or vegetative propagation material, they may procure conventional or in-conversion material. The conditions regarding this are set out in the Başak Ekolojik POL-04 Conventional Seed and Vegetative Material Use Policy.

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

In accordance with Article 27 of (EU) 2021/1698, operators in third countries who are subject to control by Başak Ekolojik and who request such authorization shall be granted a provisional authorization for a maximum period of six months for

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the use of non-organic agricultural ingredients in processed organic food, provided those ingredients are not listed in Annex V to (EU) 2021/1165. The authorization may be extended a maximum of two times, for six months each time. In accordance with Article 25(4) of (EU) 2018/848, Başak Ekolojik shall immediately notify the Commission, the accreditation body, and other control authorities and control bodies of any provisional authorization granted for the use of non-organic agricultural ingredients in processed organic food. This notification, to be made using the form provided by the Commission, shall include the justification for granting the authorization in question pursuant to Article 25(1) of Regulation (EU) 2018/848.

13.4. Catastrophic Conditions

- In accordance with Article 28 of (EU) 2021/1698, for Başak Ekolojik to recognize a situation as a catastrophic condition, an 'adverse climatic event', 'environmental event', 'natural disaster', 'catastrophic event', or any similar situation or event must be based on a declaration made by the competent authorities of the third country where the event occurred. In the absence of such a declaration, any such recognition by Başak Ekolojik shall be based on data provided by official bodies that substantiate the catastrophic conditions.
- Pursuant to Article 29 of Delegated Regulation (EU) 2021/1698, Başak Ekolojik may grant a derogation for non-organic plant reproductive material, either upon identifying affected operators in the relevant sector or at the request of the individual operator or member of a group of operators concerned.
- In the event of a disaster-level situation in the region affecting the production of plants and plant products, and where the use of organic or in-conversion plant reproductive material is not possible, non-organic plant reproductive material may be used, provided that the following conditions are met;
 - o Unless mandated by official authorities, non-organic plant reproductive material shall not be treated post-harvest with plant protection products other than those authorized for use on plant reproductive material under Regulation (EU) 2018/848. Where non-organic plant reproductive material is subjected to mandatory chemical treatment, the plot on which the treated plant reproductive material is grown shall be subject to a conversion period as specified in points 1.7.3 and 1.7.4 of Part I of Annex II to Regulation (EU) 2018/848, where applicable.
 - o In the event that plant reproductive material is in a state of conversion, the requirements set out in point 1.7 of Part I of Annex II to Regulation (EU) 2018/848 must be complied with.
 - o In addition to these, GMOs, products produced from GMOs, and products produced by GMOs shall not be used in plant reproductive material in accordance with Article 11 of Regulation (EU) 2018/848.
- Derogation;
 - a) It is granted for a limited period, provided that it does not exceed what is necessary and in no case exceeds 12 months, and organic production carried out prior to the date the derogation was granted must be continued;
 - b) It applies particularly to the affected types of production or land plots and

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c) Applies to the individual operator or the relevant group of operator member.

- Başak Ekolojik shall immediately notify the European Commission and the accreditation body—via the Organic Farming Information System (OFIS)—of the derogations. In this notification, Başak shall specifically specify the following;
 - o Name of the relevant operators,
 - o Duration of the derogation,
 - o Type of production or, where applicable, land parcels,
 - o The rationale for the derogation and
 - o A statement from the relevant authority of the third country.
- In cases where a declaration is not available, Başak Ekolojik shall justify the omission of such a declaration and provide the relevant data upon which the recognition is based.
- Başak Ekolojik shall ensure that any operator benefiting from derogations retains documentary evidence regarding the granted derogations, as well as documentary evidence concerning the use of the derogations throughout the period of their validity. Başak Ekolojik shall verify the operators' compliance with the conditions of the granted derogations.
- A derogation for non-organic plant reproductive material shall be granted using the "[Form for Using Non-Organic Plant Reproductive Material in Catastrophic Circumstances](#)" following either a statement serving as evidence issued by the competent authorities of the third country where the event occurred OR, in the absence of such a statement, the provision of data by official bodies substantiating the catastrophic conditions.

14. OTHERS

14.1. Impartiality and Confidentiality

Başak Ekolojik commits that the outcomes of its inspection and certification activities will be impartial and free from commercial, financial, or other pressures; that it will not engage in any activities creating a conflict of interest while exercising the authority granted by relevant authorities (the European Union) and the Ministry of Agriculture and Forestry; that it will not undertake the production, supply, advertising, or marketing of the products it certifies, nor provide consultancy services; and that all information generated during certification activities will be managed in accordance with confidentiality principles. Başak Ekolojik Management has declared its commitment to conducting certification activities impartially and in adherence to the principle of confidentiality, and has implemented a series of measures to ensure impartiality and confidentiality in its inspection and certification operations.

Başak Ekolojik is structured to prevent any compromise of impartiality during the certification process; within the organization, inspection and certification functions are established as separate units. Regarding certification activities, personnel performing inspection services cannot serve in the certification unit for the same scope. The Statement of Impartiality and Confidentiality, available on the Başak Ekolojik website, publicly declares the company's commitment to impartiality.

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Revision No / Date	06 / 12.10.2026	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		
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Applications to Başak Ekolojik are processed without regard to religion, language, race, membership in a specific group, political views, land size, location, or similar factors. All applications are evaluated unless there is a legal impediment or the producer has been temporarily barred from certification. Başak Ekolojik management shall not request or pressure employees to act in a manner contrary to impartiality. No employee may be assigned to certification activities for a specific operator if it is determined that they have provided consultancy services to, personally worked for, or have first-degree relatives with direct responsibility for that operator within the preceding two (2) years. Başak Ekolojik personnel are prohibited from providing consultancy services—under any designation—to the individuals, legal entities, or sectors receiving certification services. Furthermore, internal audit services may not be provided to clients receiving certification services. All Başak Ekolojik personnel must act in accordance with the [Code of Ethics Instruction](#).

Financial or bodily damages that third parties may sustain as a result of an error, fault, or negligence are covered—subject to the limits specified in the policy renewed annually by Başak Ekolojik—on a per-incident basis, within the framework of the Republic of Türkiye’s legislation regarding legal liability and Article a.1, Paragraph (b) of the General Conditions for Professional Liability Insurance.

Başak Ekolojik has established an independent impartiality committee to ensure and safeguard the impartiality of its certification activities. The committee's primary responsibility is to oversee the conduct of inspection and certification activities—ensuring they are carried out independently, objectively, consistently, and in accordance with principles of impartiality—and to report its findings and offer recommendations. All personnel, including management, as well as members of the impartiality committee, sign a Declaration of Impartiality and Confidentiality on an annual basis.

14.2 Appeal and Complaints

Appeal: *A formal, written request submitted to our organization by an applicant or operator who disagrees with decisions made following inspection and certification processes, seeking a re-evaluation of those decisions by an impartial committee.*

Complaint: *Submissions expressing dissatisfaction—other than those subject to appeal—regarding inspection and certification activities or the assigned inspectors or certifiers.*

[The Appeal and Complaint Procedure](#) and the [Appeal and Complaint Notification Form](#) are available in their current versions on our website; operators wishing to submit an appeal or complaint may do so by completing and submitting the relevant form to Başak Ekolojik. Başak Ekolojik ensures that all stages—from the submission of the Appeal and Complaint Notification Form through to the final resolution of the objection or complaint—are recorded in a manner that allows for full traceability. Appeals and complaints are addressed within five (5) business days and resolved no later than 15 days. Should the operator wish to contest a decision resulting from an appeal or complaint, the General Manager of Başak Ekolojik convenes the Appeal and Complaints Committee to review the matter. The courts with jurisdiction in the event of disputes are specified in the Organic Agriculture Control and Certification Service Agreement for reference when necessary.

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In the event of an appeal to the analysis results, a request for the analysis—or re-analysis—of the reference sample (at the operator's expense) may be submitted in writing to Başak Ekolojik within three business days of the date the analysis results were communicated to the operator, provided that the request includes the grounds upon which the appeal is based.

If the operator wishes to appeal to the decision made by Başak Ekolojik Certification, they have the right—pursuant to Article 41(1)(g) of the Turkish Organic Agriculture Regulation—to submit relevant information and documents to the Organic Agriculture Committee within a maximum of twenty-one (21) days. The Ministry has the authority to review the matter and request additional documentation. The Ministry examines the information and documents regarding the appeal or complaint, makes a final decision, and communicates the outcome to the parties involved.

In accordance with the standard to which it is subject, Başak Ekolojik reports all appeals and complaints to the Turkish Accreditation Agency, which accredits Başak Ekolojik.

14.3 Changes in Inspection and Certification System

All amendments to the Turkish and EU Organic Agriculture Regulations are announced in the "Announcements" section of the Başak Ekolojik website, and written information is also communicated to operators via e-mail. Relevant information, links, and/or documents are specified on the website and in the e-mails. It is the operator's responsibility to visit the Başak Ekolojik website, receive announcements, and monitor e-mails.

14.4 Sharing Information with the European Commission and Control Bodies

- In accordance with Article 21 of (EU) 2021/1698, Başak Ekolojik shall immediately share information regarding any suspected non-compliance affecting the integrity of organic products with the Commission and other control bodies.
- Furthermore, in the event of a notification by the Commission regarding suspected or established non-compliance affecting the integrity of imported organic products, Başak Ekolojik shall conduct an investigation in accordance with Article 22 of (EU) 2021/1698. Başak Ekolojik shall inform the Commission using the template specified in Annex III of (EU) 2021/1698. Başak Ekolojik shall respond within 30 calendar days from the date of receipt of such notification and provide all relevant information, including the results of its investigation and details of any actions and measures taken.
- Where operators and group of operators are subject to traceability and mass balance checks, Başak Ekolojik shall share the relevant information resulting from these checks.
- In the event that operators, group of operators, and/or their subcontracted entities change their control body, the new control body shall request the control file of the relevant operator or group of operators from the previous control body within 30 days. The new control body shall ensure that the previous control body provides the information specified in Article 10(3) of (EU) 2021/1698.

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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
04	General	The abbreviation TR has been corrected to ‘Turkish’. The introduction states that the guide explains the rules according to the Turkish Organic Farming Regulation and the European Union Organic Farming Regulation. It also states that the evaluation of off-farm inputs is carried out according to both the Turkish and European Union regulations.	27.04.2026
05	6.2 6.3	Surveillance inspection has been corrected to Physical Inspection. In accordance with the revision in the T-P15.04 Instruction On The Common Catalogue Of Measure, section 6.3 has been updated.	16.07.2026
06	General	The document has been improved through a general review.	12.10.2026

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