

1. AIM AND SCOPE

This instruction has been prepared to determine the policy for the management of extraordinary events or conditions affecting Başak Ekolojik and its contracted operators. In the event of extraordinary situations, it explains how the issues related to remote control techniques will be handled and applied without compromising the comprehensiveness of the routine control techniques, which are the basis for reviewing compliance with the relevant regulations and standards, while carrying out the control and certification activities of Başak Ekolojik; It covers the general principles and rules regarding the procedures and principles of the control and certification services regarding the annual inspection frequency, the number of announced and unannounced inspections, and the validity periods of the certificates to be applied to Başak Ekolojik and its operators.

'According to the Additional Article 2, added with the title 'Regulation due to force majeure' to Turkish Regulation on the Principles and Implementation of Organic Agriculture published in the Official Gazette dated 18.08.2010 and numbered 27676; (1) In the event of force majeure events such as earthquakes, floods, fires and epidemics that prevent the execution of inspection procedures by authorized institutions, the procedures and principles of the inspection and certification services regarding the annual inspection frequency, the number of announced and unannounced inspections and the validity periods of the certificates may be regulated by the Ministry.

Due to the Coronavirus disease (COVID-19), the current Instruction on Control and Certification in Organic Agriculture has been published **at last** (2021/04) and **its implementation** has been applicable until 01 June 2021

IAF ID 3(2011); IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations. (<https://www.iaf.nu/>).

2. DEFINITIONS

Başak Ekolojik Ürünler Kontrol ve Sertifikasyon Hizmetleri Tic. Ltd. Şti. hereinafter referred to as "Basak Ekolojik".

Ministry: Ministry of Agriculture and Forestry.

Extraordinary event or circumstances: A situation that is beyond the organization's control, often referred to as "force majeure" or "natural disaster". e.g; war, strike, riot, political instability, geopolitical tension, terrorism, crime, epidemic (epidemic or pandemic), flood, earthquake, malicious hacking, other natural or man-made disasters (IAF ID 3:2011).

Remote Control: It is an inspection method in which the inspector uses information technology technologies (teleconferences, online audio and video, remote access to the operator's database, etc.) to collect, store, retrieve, process, analyze and transfer information about processes and products without going to the production site, in order to ensure the continuity of the certification process due to epidemics or other force majeure reasons.

Epidemic: Coronavirus Disease (COVID-19) and similar pandemic diseases.

Virtual environment: An online environment that allows people in different physical locations to carry out inspection and certification processes. The field that allows the management of processes in the Internet or various communication environments, e.g. cloud environment vs

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	Electronic copy! Printed version is uncontrolled copy! Note: This document is issued by Başak Ekolojik Ürünler Kont. ve Sertif. Hizmetleri Tic. Ltd. Şti. (Başak Ekolojik).It cannot be copied, reproduced and shared with third parties without written permission of Başak Ekolojik.		
Page No	1 / 9			

Desk review: In desk review, the inspector examines and analyzes the data provided to him/her. Normally this relates to procedures and possible registrations. No more interaction between inspector and inspected party.

Operator: Real or legal person engaged in organic farming activities.

Group of Operator: Grower group.

3. IMPLEMENTATION

3.1. General Rules Regarding Control and Certification in Epidemics or Other Force Majeure Conditions

3.1.1. Başak Ekolojik respects and complies with government policies. This instruction comes into effect when the government closes an area to entry/exit, quarantines it or imposes a travel restriction to avoid putting people's health and safety at risk.

3.1.2. Remote control cannot provide the outputs that on-site inspection does. For this reason, Başak Ekolojik's primary approach is to inspect on-site. Where land inspection can be made on-site; Land inspection are carried out in accordance with the provisions of the relevant Regulation. During the inspection, protective measures are taken by the inspector. Inspection activities are carried out by paying attention to social distance, using protective equipment such as masks and gloves, taking necessary hygiene measures to prevent contamination.

3.1.3. Inspection and certification activities are carried out in accordance with this instruction for the continuity of only the certified products of the operators published in the previous year.

3.1.4. In case the operator has a control and certification request, Başak Ekolojik determines the most appropriate inspection method, taking into account the risk analysis and the decisions taken by the authorized institutions of the province/district where the inspection will take place. If it is not possible to reach the production area, remote control is carried out by the inspector.

3.1.5. For remote control, the operator must submit its justifications to Başak Ekolojik together with the evidence, probable causes:

- If transportation is not possible due to security and travel restrictions,
- In case of restrictions imposed by official authorities due to security/epidemic (for example, curfew on some days), the inspection cannot be carried out in accordance with the activity of the operator,
- Quarantine of the operator or the area where the producer or activity to be inspected is located due to security/epidemic reasons
- Insufficient/impossible accommodation and meals in the area/region where inspection activities will be carried out

3.1.6. Remote control should create an advantage for greater efficiency, greater security, better timing, inclusion of non-accessible personnel, and avoiding travel delays and restrictions.

3.1.7. After an on-site inspection, in extraordinary situations and conditions: remote control can be used to evaluate some missing issues and to conduct investigation.

3.1.8. Remote control and certification activities cannot be performed in the following cases:

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	2 / 9			

- i. No production activity or product to be certified.
- ii. Being an operator that signed a contract for the first time within the scope of organic farming practices.
- iii. The absence of a certificate issued in the previous year or the presence of an organic agriculture certificate in different products
- iv. There is no demand of operators for remote control and certification.
- v. Having a complaint or risk at a level that requires land inspection.
- vi. Request for the Retroactive recognition of conversion time.

3.2. In cases where field or operational controls cannot be performed on-site, Başak Ekolojik can perform certification activities according to remote control findings. Remote control activities are implemented as follows:

Application:

3.2.1. The operator must also submit the **F-P01.11.01 Remote Control Application Form** for the remote control request, apart from the application to Başak Ekolojik for annual inspection and certification.

3.2.2. Başak Ekolojik makes a risk assessment in terms of environment, human and animal health in the Application Evaluation section of the Remote control Application Form, in order to determine that the operator applying for remote control (except for the routine risk assessment) meets the appropriate conditions for remote control, and if the conditions are met, preparations for remote control will start. The application is evaluated by the General Manager as in other applications.

3.2.3. In order to carry out remote control, the operator must keep all relevant records regularly and prove/present them to Başak Ekolojik at the latest 15 days before the remote control date. These records; relevant profiles¹, farmer lists, plant production material permission letter, vendor declaration, information and documents related to other inputs, analysis report for the production period, visual outputs of critical points, traceability records, product flow and all kinds of operations related to the enterprise (see also Başak Ekolojik operator profile mandatory annexes list). If there are still deficiencies, the operator must complete these deficiencies at the latest 7 days before the remote control.

3.2.4. Before the remote control, the operator must submit the list of employees who will be responsible for the remote control (to prepare Başak Ekolojik for virtual environment etc.) together with their contact information. In group **of operator**, it is essential that the operator itself and/or its employee² be with the farmer in remote control.

3.2.5. After the risk assessment made in the application form, if appropriate, the operator is informed about the remote assessment process. For this, Başak Ekolojik fills the relevant part of the remote control application form and sends it back to the operator.

¹ *Başak Ekolojik uses the definition of 'Organic System Plan' instead of the definition of 'Profile' in the new regulations within the scope of the European Union Organic Agriculture Regulation (EU) 2018/848. The definition of 'Profile' will continue to be used in the control and certification process according to the European Commission Regulation (EC) 834/2007, until the recognition is realized according to the specified Regulation.*

² *According to Article 36 Group of Operator rules of the European Union Organic Agriculture Regulation (EU) 2018/848; The group of operator employees are the internal control system manager and internal controllers.*

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	3 / 9			

3.2.6. By signing the remote control application form, the operator also confirms that the inspection can be carried out remotely and that the inspection will be verified at the production site, at the latest, until the end of the epidemic/force majeure event.

3.2.7. Başak Ekolojik also receives the express consent from the operator regarding the recording (image and sound) of the control process, in accordance with the Law on Protection of Personal Data No. 6698, with the remote control application form.

3.2.8. Operator applying for remote control must give approval to Başak Ekolojik for the use of the records submitted with the virtual environment during the remote evaluation and for later storage or destruction.

Preparation to remote control

3.2.9. The type of virtual environment and auxiliary modules are decided together with the operator and clarified before remote control.

3.2.10. The parties themselves are responsible for the security of the virtual environment.

3.2.11. During remote control, the parties themselves are responsible for the confidentiality of the inspection, both parties should take their precautions.

3.2.12. The language used by the remote inspector and the inspected operator must be the same or the presence of a translator is required.

3.2.13. The virtual environment is tested with the operator before the remote control.

3.2.14. Başak Ekolojik preferably assigns an inspector who has carried out a previous on-site inspection for the relevant operator or has already carried out the inspection. If there is no inspector that performed the on-site inspection before, another inspector is assigned. In these extraordinary situations, the rule that the inspector should not inspect the operator in the 4th year does not apply, the inspector with knowledge of the project performing the remote control is preferred.

3.2.15. Inspector assignment and inspection plan specify 'remote control' as inspection type.

3.2.16. In remote control, the rule of 100% inspection of all farmers in grower group projects continues.³

3.2.17. In case of a grower group project that does not accept remote inspection, the Operator must submit an updated list of farmers to Başak Ekolojik.

3.2.18. Başak **Ekolojik P-01 Control and Certification Procedure**⁴ is taken into account for inspector assignment and planning.

³ Following the recognition according to Article 46(1) of the European Union Organic Production Regulation No. (EU)2018/848, Başak Ekolojik will carry out controls for groups of operators in accordance with the principles defined in the main regulation (EU)2018/848, supplementary and implementing regulations, instead of 100% control in operators, and will comply with Commission instructions in case the EU Commission has a special official notification on remote control.

⁴ According to the European Union Organic Production Regulation No (EU) 2018/848, P-15 Control and Certification Procedure has been prepared for control and certification and these procedure rules will be taken into account when relevant.

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	4 / 9			

3.2.19. Atanan kontrolör, uzaktan kontrol öncesinde masa başı denetimini yapmalıdır. Masa Başı denetiminde kontrolörün inceleyeceği dokümanlar aşağıdadır. Kontrolör, ayrıca ek doküman talep edebilir.

- The current profile⁵ of the operator and all mandatory additional documents
- Control report of the previous year and its noncompliances, corrective actions, analysis report results and decisions taken,
- Civil and administrative documents of operator; ÇKS (farmer registration system), title deed, lease contracts, maintenance contracts etc
- Purchase, processing, storage, sales records, label samples of the operator's organic product sales

3.3. During remote control;

3.3.1. Although the relevant part of Başak Ekolojik Control and Certification Procedure⁶ is essential in performing of the inspection, for remote inspection;

- i. Quiet surroundings, good connection quality is expected
- ii. The opening and exit meeting is part of the inspection, done naturally.
- iii. Comments of the inspection should be recorded in the control report: The inspection was done according to the planning, connection problems, communication, etc.
- iv. Within the framework of the general provisions regarding sampling, the sample is taken by the operator and sent for analysis to the laboratory that Başak Ekolojik has contracted as outsource and is on the subcontracted laboratory list. Başak Ekolojik evaluates the scope and results of the analysis by requesting it from the relevant laboratory. According to the results of the risk analysis made according to the information given in the remote control application form, support is requested from the provincial/district directorates of the Ministry, when necessary, to take samples or accompany the sample taking, and to send the sample taken safely to the laboratory. Başak Ekolojik sampling form and necessary tools (gloves, sample bags, seals, labels) are submitted to the operator or to the provincial/district directorates of the Ministry as necessary and requests to be filled and returned. Photo/video must have been taken during sampling.
- v. After remote control, the inspector conducts a desk review and if a situation that does not comply with the organic agriculture legislation is detected, the sanctions specified in the provisions of the relevant Regulation are applied and the operator is notified in writing, it is requested to sign and return it with an electronic or wet signature as possible.
- vi. The control report presents all the data viewed and examined: for example the buffer lines of the land, the nursery, the producer's warehouse, the farm warehouse etc. Basak Ekolojik routine control reports continue to be used as control reports.

⁵ Başak Ekolojik uses the definition of 'Organic System Plan' instead of the definition of 'Profile' in the new regulations within the scope of the European Union Organic Agriculture Regulation (EU) 2018/848. The definition of 'Profile' will continue to be used in the control and certification process according to the European Commission Regulation (EC) 834/2007, until the recognition is realized according to the specified Regulation.

⁶ According to the European Union Organic Production Regulation No (EU) 2018/848, P-15 Control and Certification Procedure has been prepared for control and certification and these procedure rules will be taken into account when relevant.

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	5 / 9			

vii. Apart from filling out the regular control report after the remote control, the inspector states the results of the preparation for the inspection and the performing of the inspection, separately for each field of activity, under the heading A on the document named **F-P01.11.02 Remote Control and Certification Evaluation Form**.

3.4. Certification activity;

3.4.1. A certificate⁷ is not issued to the operator who cannot effectively close the corrective actions in compliance with the provisions of the relevant Regulation or cannot meet the necessary conditions during remote control. In certification, Başak Ekolojik inspection and certification procedures⁸ are essential.

3.4.2. If the inspection cannot be performed due to the technical failure of the virtual environment, the remote control can be repeated with the request of the operator, but if the technical problems are caused by the operator, the operator must cover the cost.

3.4.3. After reviewing the inspection file, the certifier fills in part B of the **F-P01.11.02 Remote Control and Certification Evaluation Form**, separately for each field of activity that is remotely inspected, and indicates the adequacy of the remote control for certification. A certificate is issued for the field of activity whose remote control has been successfully completed.

3.4.4. The validity period of certificates issued as a result of remote control is maximum six months from the date of issue. It is noted on the certificate that there is a 'remote control' next to the inspection date. In case of an on-site inspection within the validity period of the certificate, the validity period of the certificate can be extended up to twelve months from the first issue date. In case of on-site inspection after the certificate validity period has expired, the certificate period cannot be extended.

3.4.5. Digital copies of signed certificates are sent electronically to the operator. Wet signed certificates are delivered to the relevant parties after the end of the epidemic.

3.4.6. A certificate cannot be issued if the operator, due to extraordinary circumstances, cannot work towards closing the non-compliances detected after remote control. As soon as the unusual circumstances are removed, the verification of actions is carried out by on-site visit.

3.4.7. For certified projects suspended prior to extraordinary circumstances, the suspension will be extended until corrective action is verified. Failure to verify corrective actions due to unusual circumstances will not lead to withdrawal of the certificate. As soon as the unusual circumstances are removed, the verification of the actions will be carried out by on-site visit.

⁷ Following the recognition according to Article 46(1) of the European Union Organic Production Regulation No. (EU)2018/848, in accordance with the Commission Implementation Regulation (EU)2021/1378, Başak Ekolojik provides operators, groups of operators and exporters in third countries with the 'certificate' confirming that such operators, groups of operators and exporters comply with Regulation (EU) 2018/848 and the 'certificate' will conform to the model presented in Annex I to (EU)2021/1378 and be issued electronically in the TRACES system.

⁸ According to the European Union Organic Production Regulation No (EU) 2018/848, P-15 Control and Certification Procedure has been prepared for control and certification and these procedure rules will be taken into account when relevant.

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	Electronic copy! Printed version is uncontrolled copy!		
Page No	6 / 9	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.		

3.4.8. After the extension of the certification made as a result of the remote control, if the on-site inspection cannot be carried out and no further instructions have been received from the official authorities (EU or TR), the certificate is suspended.

3.4.9. When the certificate period expires of the operators whose on-site inspection cannot be performed and who do not have a remote control request and whose remote control is not successfully completed, certificates are suspended.

3.5. Onsite Inspection After Remote Control;

Announced and unannounced on-site inspections are carried out on certification activities carried out by remote control, starting from the end of the epidemic disease/force majeure, until the end of the year at the latest.

In remote control, the conformity of the information, documents, reports and documents sent by the operator is verified with land inspections and objective evidence. In such verification inspections, the number of operators to be audited in one day, which is included in the TR Regulation, can be doubled by taking into account the risk analysis. In matters whose conformity cannot be verified, action is taken in accordance with the provisions of the relevant Regulation.

3.6. Other Implementations

3.6.1. Başak Ekolojik records information on control and certification activities to OTBİS (Organic Farming information System) by selecting the "remote control" button, within the periods specified in the TR Regulation.

3.6.2. Operators who have obtained their previous certificate from another control body, regarding the giving all the necessary information and documents (including the control report and a report on the issues related to corrective actions) to Başak Ekolojik within a maximum of fifteen days, The process of remote control and certification specified in this instruction can be started. (2021/04 Ministry instruction article 6-2: When necessary, the authorized body that issued the certificate for the year 2020 gives a report on the control report and corrective actions to the operators).

3.6.3. The files of the operators who have been controlled and certified within the framework of the instruction numbered 2021/04 are primarily evaluated by the neutrality mechanism within the framework of TS EN ISO/IEC 17065 and Article 5.2 of the Başak Ekolojik Quality Hand Book. Başak Ekolojik ensures the competence of the personnel involved in the remote inspection and certification processes to provide services by using information technologies, and carries out and records the trainings that will include preventive measures related to the epidemic.

3.6.4. Başak Ekolojik monitors whether the epidemic disease process continues or ends throughout the country or in individual provinces/districts for the implementation of this instruction.

3.6.5. The responsibilities of the operator in order to prevent the risks arising as a result of the epidemic are as follows. Başak Ekolojik confirms that these responsibilities are fulfilled in [F-P01.11.02 Remote Control and Certification Evaluation Form](#).

- Develops, implements and records written and visual rules to ensure product safety and occupational health and safety.
- Organizes training for its employees on hygiene and protective measures.

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	7 / 9			

iii. Takes necessary precautions regarding personnel suspected of epidemic disease. By making a risk assessment regarding this, it works to prevent the spread of the epidemic, to protect product safety and the health of employees.

iv. Takes the necessary precautions so that the sanitation measures used by the employees during production or in the warehouse do not deteriorate the integrity of the organic product.

3.6.6. Başak Ekolojik continuously informs the contracted operators about the changes made in the control and certification processes within the framework of this instruction due to the epidemic.

3.6.7. During the on-site inspection, if the control is canceled due to extraordinary circumstances, the operator should take the decision for cancellation or postponement, and the reasons for remote control specified in 3.1.5. should be established. In this case, all the instruction required by the remote control is followed from the beginning (operator application, commitments, risk assessment, remote control etc.)

3.6.8. This instruction is implemented between the dates notified by the Ministry during the epidemic disease period and ***after an on-site inspection, in extraordinary situations and conditions: for the evaluation of some missing issues and for carrying out investigation.***

4. RELATED DOCUMENTS / RESOURCES

- Control and Certification Procedure (P-01)
- Remote Control Application Form (**F-P01.11.01**)
- Remote Control and Certification Evaluation Form (**F-P01.11.02**)

5. REFERENCES

'Additional Article 2, added to Turkish Regulation on the Principles and Implementation of Organic Agriculture published in the Official Gazette dated 18.08.2010 and numbered 27676, under the heading 'Regulation due to force majeure', Current Instruction on Inspection and Certification in Organic Agriculture due to the Coronavirus disease (COVID-19) (2021/04),

IAF ID 3(2011): IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations: <https://www.iaf.nu/>,

IAF ID 12(2015): Principles on Remote Assesment,

P705(2020): TÜRKAK Remote Audit Procedure.

6. DISTRIBUTION

An electronic copy of this document is available to all personnel in the Başak Ekolojik Institutional Portal System (SharePoint).

7. REVISION HISTORY

Revision No	Relevant Article	Revision	Revision Date
-------------	------------------	----------	---------------

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	8 / 9			

INSTRUCTION ON REMOTE CONTROL OF BAŞAK EKOLOJİK

02	General	TR-AB code has been removed from the name of the document and the names of the KYS Document in the instruction. Main headings are all capitalized.	03.01.2022
03	4.1.7	After an on-site inspection, remote control can also be used in extraordinary situations and conditions: to evaluate some missing issues and to conduct investigation.	20.01.2022
04	General	Adjustments have been made according to the new EU organic production Regulation with number (EU)2018/848	24.11.2022

Document No	T-P01.11	Prepared by	Checked by	Approved by
Release Date	04.05.2020	Meltem Işıldak	Ersoy Padalı	Asaf Özkan
Revision No / Date	04 / 24.11.2022	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	9 / 9			