

Catalogue of Sanctions
for the implementation of “EU regulation 848/2018 and its updates and consolidated versions
as well as EU regulation 848/2018 and its updates and consolidated versions as well as in
EGYCER Production Standard and Control Measures”

The present **Catalogue of Sanctions** includes all the applicable corresponding measures and sanctions that EGYCERT imposes to any operator subject to the Organic Control System, in case of identified infringements and irregularities affecting the organic status of products, according to the requirement laid down in “**Article VI of EU regulation 848/2018 and its updates and consolidated versions** “ as well as in “**point 5.19 of EGYCERT Production Standard & Control Measures**”.

The present rules on sanctions are applicable to irregularities and infringements against the requirements laid down in EU regulation 848/2018 and its updates and consolidated versions as well as in EU regulation 848/2018 and its updates and consolidated versions as well as in EGYCERT Production Standard and Control Measures. The sanctions provided for, are effective, proportionate and dissuasive. EGYCERT shall take all measures necessary to ensure that they are implemented.

Note:

EGYCER Catalogue of Sanctions, like EU regulation 848/2018 and its updates and consolidated versions as well as in EGYCERT Production Standard and Control Measures, widely adopts the use of the term “non-compliance” to indicate a failure of the operator/product to conform to the Standard’s minimum requirements. The reason is that Regulations (EC) 834/2007 & 889/2008, against which the Standard has been benchmarked for equivalence, use the same term “non-compliance” for the same cases. ISO/IEC 17000:2004 “Conformity assessment -- Vocabulary and general principles” does not include a definition of “conformity” on the grounds that it is not deemed necessary to do so. “Conformity” does not feature in the definition of “conformity assessment”. The concept of “conformity assessment” is concerned with “fulfilment of specified requirements”, not with the wider concept of “conformity” itself. A definition of the term “specified requirement” is included. In English, the term “compliance” is used to distinguish the action of doing what is required (e.g. an organization “complies” by making something conform or by fulfilling a regulatory requirement).

Terms and Definitions:

Critical Non-compliance: shall mean any non-compliance against a requirement of “*EU regulation 848/2018 and its updates and consolidated versions*” as well as “*EU regulation 848/2018 and its updates and consolidated versions as well as in EGYCERT Production Standard and Control Measures*” resulting from an act or omission by an operator subject to the Organic Control System.

Major & Minor Non-compliance: shall mean any irregularity which has, or would have, the effect of affecting the organic status of the products. Those types of irregularities are directly associated with intentionality, fraud or severe omissions by the operator against the requirements of *EU regulation 848/2018 and its updates and consolidated versions*” as well as “*EU regulation 848/2018 and its updates and consolidated versions as well as in EGYCERT Production Standard and Control Measures*”. Infringements with prolonged effects in particular, do not only compromise the integrity of the affected organic products but future products as well. The period during which an operator is prohibited from marketing organic products should be considered on a case-by-case basis.

Measures:

1. Continuation of Certification under condition. Corrections taken by operator in order to achieve compliance – follow up needed
2. Written notification with a specific deadline for achieving compliance – follow up needed
3. Withdrawal of any reference to the organic production method from a non-compliant/suspicious product
4. Separation of non-compliant/suspicious product lot – follow up needed
5. Informing in writing the buyers of the product – provide objective evidence of implementation to EGYCERT
6. Additional control visits (increased surveillance)
7. Samplings and laboratory testing
8. Notification of Competent Authorities/Control Bodies/Control Authorities

Sanctions:

- A. **Suspension** of the Certification, pending remedial actions by the operator
- B. **Reduction** in the Certification Scope to remove non-compliant product variants (reduction includes the partial or full downgrading of a product lot or an entire production unit or product category to the “in conversion” or “non-organic” state)
- C. **Withdrawal** of Certification
- D. **Termination** of the Service Contract
- E. **No re-acceptance** in the Organic Control System for a defined period (*it can only be imposed as a supplementary sanction in cases of Termination of the Service Contract*)

Suspension and Reduction of Certification shall be partial or full depending on the case assessed.

The selection of the most appropriate combination of sanctions imposed and measures taken for each particular case, shall depend on the following factors, either combined or alone:

- If the Critical, Major or Minor Non-compliance is caused intentionally
- If the minor non-compliance creates prolonged effects
- If the minor non-compliance is related in any way with fraud
- If the same Critical, Major or Minor Non-compliance had been identified for the same operator in the near past (*repetition: Any identified non-compliance, either Critical, Major or Minor Non-compliance that is repeated during consecutive evaluations, shall be escalated. Therefore more dissuasive sanctions and measures shall be taken against the operators in such cases*)
- The intensity and the severity of the identified non-compliance

EGYCERT Certifiers shall have to assess the severity and the intensity of any non-compliance in order to decide the most appropriate sanctions and measures.

Example of severity:

An operator keeps records of applications to meet the requirements of the Standard but the quality of the data is not sufficient to achieve compliance.

→ **Low severity**

An operator does not keep any records of applications

→ **High severity**

The Sanctions & Measures imposed shall differ between the 2 cases

Example of intensity:

An operator has not taken appropriate measures to avoid the risk of contamination from neighboring non-organic farms, in one out of his many farm parcels

→ **Low intensity**

An operator has not taken appropriate measures to avoid the risk of contamination from neighboring non-organic farms, in any of his farm parcels

→ **High intensity**

The Sanctions & Measures imposed shall again differ between the 2 cases.

The List of Critical, Major and Minor Non-compliances provide more detail on:

- the classifications of different types of non-compliance;
- the types of actions that fall under each classification;
- the action that EGYCERT is expected to take in respect of each type of classification;
- the timescale for taking action; and
- any follow-up action that might be necessary

List of Irregularities and Infringements

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
3.2. Prohibition on the use of GMOs					
GMOs and products produced from or by GMOs have been used as food, processing aids, plant protection products, fertilizers, soil conditioners, seeds, vegetative propagating material and micro-organisms in organic production.	X			3, 4, 5, 7, 8	A, B, C, D, E
With regard to products not being food, or products produced by GMOs, operators using such non-organic products purchased from third parties did not require the vendor to confirm that the products supplied have not been produced from or by GMOs.			X	1, 2, 6	A
3.3. Prohibition on the use of ionising radiation					
Use of ionising radiation for the treatment of organic food, or of raw materials used in organic food		X		3, 4, 5, 7, 8	A, B, C, D, E
3.4. General farm production rules					
Not all units of a holding are used for organic production and the operator does not keep the land and products used for, or produced by, the organic units separate from those used for, or produced by, the non-organic units and does not keep adequate records to show the separation.		X		1, 2, 3, 4, 5, 6, 7	A, B
3.5. Plant production rules					
Organic plant production does not use tillage and cultivation practices that maintain or increase soil organic matter, enhance soil stability, and soil biodiversity, and prevent soil compaction and soil erosion;		X		1, 2, 6	A, B
The fertility and biological activity of the soil shall be maintained and increased by multiannual crop rotation including legumes and other green manure crops, and by the application of livestock manure or organic material, both preferably composted, from organic production.		X		1, 2, 6	A, B
Fertilizers and soil conditioners used, have not been authorised for use in organic production.			X	3, 4, 5, 7, 8	B, C, D, E
Use of mineral nitrogen fertilizers.			X	3, 4, 5, 7, 8	B, C, D, E
Not all plant production techniques used prevent or minimize any contribution to the contamination of the environment.		X		1, 2, 6	A, B
The prevention of damage caused by pests, diseases and weeds does not rely primarily on the protection by natural enemies, the choice of species and varieties, crop rotation, cultivation techniques and thermal processes.		X		1, 2, 6	A, B
In the case of an established threat to a crop, plant protection products used have not been authorised for use in organic production.			X	3, 4, 5, 7, 8	B, C, D, E
For the production of products other than seed and vegetative propagating material not only organically produced seed and propagating material has been used. The mother plant in the case of seeds and/or the parent plant in the case of vegetative propagating material have not been produced in accordance with the rules laid down in this Standard for at least one generation, or, in the case of perennial crops, two growing seasons;		X		3, 4, 5, 6	A, B
Products for cleaning and disinfection used in plant production have not been authorised for use in organic production.		X		3, 4, 5, 6	A, B
Areas used for the collection of wild plants and parts thereof, growing naturally in natural areas, forests and agricultural areas have not, for a period of at least three years before the collection, been free of treatment with products other than those authorised for use in organic production.		X		1, 2, 3, 4, 5, 6	A, B, C
The collection of wild plants and plants thereof, is practiced in a way that negatively affects the stability of the natural habitat or the maintenance of the species in the collection area.		X		1, 2, 6	A, B, C
3.6. Soil management and fertilization					
Where the nutritional needs of plants cannot be met by measures provided for at point 3.5, only fertilizers and soil conditioners referred to in ANNEX II Part I of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex I of Egcert Production Standard and control measures may be used in organic production and only to the extent necessary. Operators do not keep documentary evidence of the need to use the product.		X		1, 2, 6	A
The total amount of livestock manure applied on the holding exceeds 170 kg of nitrogen per year/hectare of agricultural area used. This limit shall only apply to the use of farmyard manure, dried farmyard manure and dehydrated poultry manure, composted animal excrements, including poultry manure, composted farmyard manure and liquid animal excrements.		X		1, 2, 6	A

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
Organic-production holdings may establish written cooperation agreements exclusively with other holdings and enterprises which comply with the organic production rules, with the intention of spreading surplus manure from organic production. The maximum limit as referred to in paragraph 2 above shall be calculated on the basis of all of the organic-production units involved in such cooperation. No evidence provided about compliance with the requirement.		X		1, 2, 6	A
3.7. Prohibition of hydroponic production					
Hydroponic production is used.			X	3, 4, 5, 7, 8	B, C, D, E
3.8. Pest, disease and weed management					
Where plants cannot be adequately protected from pests and diseases by the measures provided for at point 3.5, only products referred to in ANNEX II Part I of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex II of EGYCERT Production Standard and control measures may be used in organic production. Operators do not keep documentary evidence of the need to use the product.	X			1, 2, 6	A
For products used in traps and dispensers, except pheromone dispensers, the traps and/or dispensers, do not prevent the substances from being released into the environment and do not prevent contact between the substances and the crops being cultivated. The traps are not collected after use and are not disposed of safely.	X			3, 4, 5, 6, 7	A, B, C
3.9. Specific rules on mushroom production					
For production of mushrooms, substrates used, do not comply fully or partly with the composition of the following components: (a) farmyard manure and animal excrements: (i) either from holdings producing according to the organic production method; (ii) or referred to in ANNEX II Part I of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex II of EGYCERT Production Standard and control measures, only when the product referred to in point (i) is not available; and when they do not exceed 25% of the weight of total components of the substrate, excluding the covering material and any added water, before composting; (b) products of agricultural origin, other than those referred to in point (a), from holdings producing according to organic production method; (c) peat not chemically treated; (d) wood, not treated with chemical products after felling; (e) mineral products referred to in ANNEX II Part I of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex II of EGYCERT Production Standard and control measures water and soil.	X			1, 2, 3, 4, 5, 6, 7	A, B, C
3.13. General rules on the production of processed food					
The preparation of processed organic food is not kept separate in time or space from non-organic food.		X		3, 4, 5, 6, 7	A, B, C
The following condition does not apply to the composition of organic processed food: (a) the product shall be produced mainly from ingredients of agricultural origin; in order to determine whether a product is produced mainly from ingredients of agricultural origin added water and cooking salt shall not be taken into account;		X		3, 4, 5, 6, 7	A, B, C
The following condition does not apply to the composition of organic processed food: (b) only additives, processing aids, flavourings, water, salt, preparations of micro-organisms and enzymes, minerals, trace elements, vitamins, as well as amino acids and other micronutrients in foodstuffs for particular nutritional uses may be used, and only in so far as they have been authorised for use in organic production in accordance with this Standard;		X		3, 4, 5, 6, 7	A, B, C
The following condition does not apply to the composition of organic processed food: (c) non-organic agricultural ingredients may be used only if they have been authorised for use in organic production in accordance with this Standard;		X		3, 4, 5, 6, 7	A, B, C
The following condition does not apply to the composition of organic processed food: (d) an organic ingredient shall not be present together with the same ingredient in non-organic form or an ingredient in conversion;			X	3, 4, 5, 6, 7, 8	A, B, C, D, E
The following condition does not apply to the composition of organic processed food: (e) food produced from in-conversion crops shall contain only one crop ingredient of agricultural origin.		X		3, 4, 5, 6, 7	A, B, C
Substances and techniques that reconstitute properties that are lost in the processing and storage of organic food, that correct the results of negligence in the processing of these products or that otherwise may be misleading as to the true nature of these products have been used.			X	3, 4, 5, 6, 7, 8	A, B, C, D, E
3.14. General rules on the production of organic yeast					

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
For the production of organic yeast not organically produced substrates have been used.		X		3, 4, 5, 6, 7	A, B, C
Organic yeast are present in organic food together with non-organic yeast.		X		3, 4, 5, 6, 7	A, B, C
3.15. Rules for preserving products and for the production of processed food					
Operators preserving products or producing processed food do not establish and update appropriate procedures based on a systematic identification of critical processing steps. The application of those procedures does not guarantee at all times that preserved or processed products comply with the organic production rules.	X			3, 4, 5, 6, 7	A, B, C
Operators do not comply with and implement the procedures referred to in paragraph 1. In particular, operators do not: (a) take precautionary measures to avoid the risk of contamination by unauthorised substances or products;	X			3, 4, 5, 6, 7	A, B, C
Operators do not comply with and implement the procedures referred to in paragraph 1. In particular, operators do not: (b) implement suitable cleaning measures, monitor their effectiveness and record those measures;	X			1, 2, 3, 4, 5, 6, 7	A, B, C
Operators do not comply with and implement the procedures referred to in paragraph 1. In particular, operators do not: (c) guarantee that non-organic products are not placed on the market with an indication referring to the organic production method.	X			3, 4, 5, 6, 7, 8	A, B, C, D, E
Where non-organic products are also prepared or stored in the preparation unit concerned and the operator does not: (a) carry out the operations continuously until the complete run has been dealt with, separated by place or time from similar operations carried out on non-organic products;		X		3, 4, 5, 6, 7	A, B, C
Where non-organic products are also prepared or stored in the preparation unit concerned and the operator does not: (b) store organic products, before and after the operations, separate by place or time from non-organic products;		X		3, 4, 5, 6, 7	A, B, C
Where non-organic products are also prepared or stored in the preparation unit concerned and the operator does not: (c) inform the control authority or control body of the operations referred to in points (a) and (b) and keep available an updated register of all operations and quantities processed;		X		1, 2, 3, 4, 5, 6, 7	A
Where non-organic products are also prepared or stored in the preparation unit concerned and the operator does not: (d) take the necessary measures to ensure identification of lots and to avoid mixtures or exchanges with non-organic products;			X	3, 4, 5, 6, 7, 8	A, B, C, D
Where non-organic products are also prepared or stored in the preparation unit concerned and the operator does not: (e) carry out operations on organic products only after suitable cleaning of the production equipment.		X		1, 2, 3, 4, 5, 6, 7	A
Additives, processing aids and other substances and ingredients used for processing food and any processing practice applied, such as smoking, do not respect the principles of good manufacturing practice.		X		1, 2, 3, 4, 5, 6, 7	A
3.17. Use of certain products and substances in processing of food and yeast					
Other than the following substances have been used in the processing of organic food, with the exception of products of the wine sector, for which specific provisions apply: (a) substances listed in ANNEX II Part IV & Part VII of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex II of EGYCERT Production Standard and control measures to this Standard;		X		3, 4, 5, 6, 7	A, B
Other than the following substances have been used in the processing of organic food, with the exception of products of the wine sector, for which specific provisions apply: (b) preparations of micro-organisms and enzymes normally used in food processing; however, enzymes to be used as food additives have to be listed in ANNEX II Part IV & Part VII of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex II of EGYCERT Production Standard and control measures Section A;		X		3, 4, 5, 6, 7	A, B
Other than the following substances have been used in the processing of organic food, with the exception of products of the wine sector, for which specific provisions apply: (c) substances, and products such as natural flavouring substances and flavouring preparations as defined in points 1.3(41) and (42) of this Standard labelled as natural flavouring substances or natural flavouring preparations;		X		3, 4, 5, 6, 7	A, B
Other than the following substances have been used in the processing of organic food, with the exception of products of the wine sector, for which specific provisions apply:		X		3, 4, 5, 6, 7	A, B

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
(d) drinking water and salt (with sodium chloride or potassium chloride as basic components) generally used in food processing;					
Other than the following substances have been used in the processing of organic food, with the exception of products of the wine sector, for which specific provisions apply: (e) minerals (trace elements included), vitamins, aminoacids, and micronutrients, only authorised as far their use is legally required in the foodstuffs in which they are incorporated.		X		3, 4, 5, 6, 7	A, B
For the purpose of the calculation, (a) food additives listed in ANNEX II Part IV of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex III of EGYCER Production Standard and control measures and marked with an asterisk in the column of the additive code number, have not been calculated as ingredients of agricultural origin;		X		3, 4, 5, 6	A, B
For the purpose of the calculation, (b) preparations and substances referred to in paragraph (1)(b),(c),(d) and (e) and substances not marked with an asterisk in the column of the additive code number have been calculated as ingredients of agricultural origin;		X		3, 4, 5, 6	A, B
For the purpose of the calculation, (c) yeast and yeast products have not been calculated as ingredients of agricultural origin.		X		3, 4, 5, 6	A, B
Other than the following substances have been used in the production, confection and formulation of yeast: (a) substances listed in ANNEX II Part VII of EU regulation 848/2018 and its updates and consolidated versions as well as of Annex III of EGYCER Production Standard and control measures, Section;		X		3, 4, 5, 6	A, B
Other than the following substances have been used in the production, confection and formulation of yeast: (b) products and substances referred to in paragraph (1)(b) and (e) of this point.		X		3, 4, 5, 6	A, B
3.18. Use of certain non-organic ingredients of agricultural origin in processing food					
Other than the non-organic agricultural ingredients listed in Annex V to this Standard have been used in the processing of organic food.		X		3, 4, 5, 6, 8	A, B, C, D, E
3.20. Use of certain products and substances					
Products of the wine sector shall be produced from organic raw material.			X	3, 4, 5, 6, 8	A, B, C, D, E
For the purposes of point 3.13(2)(b) of EU regulation 848/2018 and its updates and consolidated versions as well as in EGYCER Production Standard and Control Measures, only products and substances listed in Annex IV can be used for the making of products of the wine sector, including during the processes and oenological practices, subject to the conditions and restrictions laid down in this Standard.		X		3, 4, 5, 6, 7	A, B
Products and substances listed in ANNEX II Part IV of EU regulation 848/2018 and its updates and consolidated versions as well as Annex IV of EGYCER Production Standard and Control Measures marked with an asterisk, derived from organic raw material, shall be used if available.		X		3, 4, 5, 6	A, B
3.21. Oenological practices and restrictions					
Not only oenological practices, processes and treatments, including the restrictions provided for in Article 80 of European Regulation (EC) No 1308/2013 and in Articles 3, 5 to 9 and 11 to 14 of European Regulation (EC) No 606/2009 and in their Annexes have been used in the making of wine.		X		3, 4, 5, 6	A, B
The use of the following prohibited oenological practices, processes and treatments has been used: (a) partial concentration through cooling according to point (c) of Annex VIII, Part I to Regulation (EC) No 1308/2013; (b) elimination of sulphur dioxide by physical processes according to point 8 of Annex I A to Regulation (EC) No 606/2009; (c) electrolysis treatment to ensure the tartaric stabilisation of the wine according to point 36 of Annex I A to Regulation (EC) No 606/2009; (d) partial dealcoholisation of wine according to point 40 of Annex I A to Regulation (EC) No 606/2009; (e) treatment with cation exchangers to ensure the tartaric stabilisation of the wine according to point 43 of Annex I A to Regulation (EC) No 606/2009.			X	3, 4, 5, 6	A, B, C
The use of the following oenological practices, processes and treatments has not met the following conditions: (a) for heat treatments according to point 2 of Annex I A to Regulation (EC) No 606/2009, the temperature shall not exceed 70 °C; (b) for centrifuging and filtration with or without an inert filtering agent according to point 3 of Annex I A to Regulation (EC) No 606/2009, the size of the pores shall be not smaller than 0,2 micrometer.		X		3, 4, 5, 6	A, B
3.22. Parallel production					

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, (i) the production in question does not form part of a conversion plan in respect of which the producer gives a firm undertaking and which provides for the beginning of the conversion of the last part of the area concerned to organic production in the shortest possible period which may not in any event exceed a maximum of five years;			X	1, 2, 3, 4, 5, 6	A, B
in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, (ii) appropriate measures have not been taken to ensure the permanent separation of the products obtained from each unit concerned;			X	1, 2, 3, 4, 5, 6, 7	A, B
in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, (iii) EGYCER has not been notified of the harvest of each of the products concerned at least 48 hours in advance;			X	3, 4, 5, 6, 7	A, B, C
in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, (iv) upon completion of the harvest, the producer has not informed EGYCER of the exact quantities harvested on the units concerned and of the measures applied to separate the products;			X	3, 4, 5, 6, 7	A, B, C
in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, (v) the conversion plan and the control measures have not been submitted and approved by EGYCER; this approval shall be confirmed each year after the start of the conversion plan;			X	3, 4, 5, 6, 7	A, B, C
3.23. Use of seed or vegetative propagating material not obtained by the organic production method					
Operator used non-organic seed or vegetative propagation material without seeking prior authorization from EGYCER (EGYCER may authorize the use of non-organic seed or vegetative propagating material if not available from organic production. However, for the use of non- organic seed and seed potatoes the following paragraphs (2) to (7) apply).		X		3, 4, 5, 6	A, B, C
Non-organic seed and seed potatoes used under authorization, are treated with plant protection products, other than those authorised for treatment of seed in accordance with point 3.8(1), unless chemical treatment is prescribed in accordance with National Law in the Country of operation for phytosanitary purposes by the competent authority of that Country for all varieties of a given species in the area where the seed or seed potatoes are to be used.		X		3, 4, 5, 6	A, B, C
3.24. Addition of non-organic yeast extract					
In order to ensure production of well established food products in organic form, the addition of non-organic yeast extract or autolysate to the substrate (calculated in dry matter) for the production of organic yeast, where operators are unable to obtain yeast extract or autolysate from organic production, has exceeded the 5% threshold.		X		3, 4, 5, 6	A, B
3.25. Collection of products and transport to preparation units					
Operators carries out simultaneous collection of organic and non-organic products and no appropriate measures are taken to prevent any possible mixture or exchange with non-organic products and to ensure the identification of the organic products. The operator does not keep the information relating to collection days, hours, circuit and date and time of reception of the products available to EGYCER.		X		3, 4, 5, 6	A, B, C
3.26. Packaging and transport of products to other operators or units					
Operators do not ensure that organic products are transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by law: (a) the name and address of the operator and, where different, of the owner or seller of the product; (b) the name of the product accompanied by a reference to the organic production method; (c) the name and/or the code number of EGYCER; and (d) where relevant, the lot identification mark according to a marking system either approved at national level or agreed with the control body or authority and which permits to link the lot with the accounts referred to in point 5.6. (The information referred to in points (a) to (d) of the first subparagraph may also be presented on an accompanying document, if such a document can be undeniably linked with the packaging, container or vehicular transport of the product. This accompanying document shall include information on the supplier and/or the transporter).		X		1, 2, 3, 4, 5	A, B
3.27. Reception of products from other units and other operators					

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
On receipt of an organic product, the operator does not check the closing of the packaging or container where it is required and the presence of the indications provided to in point 3.26. The operator does not crosscheck the information on the label referred to in point 3.26 with the information on the accompanying documents. The result of these verifications is not mentioned in the documentary accounts referred to in point 5.6.		X		1, 2, 3, 4, 5	A, B
3.28. Storage of products					
For the storage of products, areas are not managed in such a way as to ensure identification of lots and to avoid any mixing with or contamination by products and/or substances not in compliance with the organic production rules. Organic products shall be clearly identifiable at all times.			X	3, 4, 5, 6, 7	A, B, C
In case of organic plant production units, storage of input products other than those authorised under this Regulation is prohibited in the production unit.		X		3, 4, 5, 6, 7	A, B, C
Operators handle both non-organic products and organic products and the latter are stored in storage facilities in which also other agricultural products or foodstuffs are stored: (a) the organic products are not kept separate from the other agricultural products and/or foodstuffs; (b) not all measures are taken to ensure identification of consignments and to avoid mixtures or exchanges with non- organic products; (c) suitable cleaning measures, the effectiveness of which should be checked, have not been carried out before the storage of organic products; operators do not record these operations.			X	3, 4, 5, 6, 7	A, B, C
3.29 Special rules for the exportation of products to the European Union					
Organic products are exported from a country EGYCER operates its Organic Control System to the European Union, in an inappropriate packaging or containers, not closed in a manner preventing substitution of the content and not provided with identification of the exporter and with any other marks and numbers serving to identify the lot and with the certificate of control for import from third countries (non-EU) as appropriate, according to the requirements laid down in European Regulations (EC) of EU regulation 848/2018 and its updates and consolidated versions as well as EGYCER Production Standard and control measures		X		3, 4, 5, 6, 7	A, B, C
4.1. Use of terms referring to organic production					
A non-organic product is bearing terms referring to the organic production method in the labelling, advertising material or commercial documents, described in terms suggesting to the purchaser that the product and its ingredients have been obtained in accordance with the rules laid down in this Standard. In particular, the terms listed in Annex X, their derivatives or diminutives, such as 'bio' and 'eco', alone or combined, have been used for non-organic products exported to the European Union and in any European Community language for the labelling and advertising of those products, which do not satisfy the requirements set out under or pursuant to this Standard.			X	3, 4, 5, 6, 7, 8	A, B, C, D, E
In the labelling and advertising of unprocessed agricultural products terms referring to the organic production method have been used where, not all the ingredients of that product have been produced in accordance with the requirements laid down in this Standard.		X		3, 4, 5, 6, 7, 8	A, B, C, D, E
The terms referred to in paragraph 1 have been used in the European Union and in any European Community language for the labelling, advertising and commercial documents of a product which does not satisfy the requirements set out under this Standard, unless they are not applied to agricultural products in food or clearly have no connection with organic production. Furthermore, any terms, including terms used in trademarks, or practices used in labelling or advertising liable to mislead the consumer or user by suggesting that a product or its ingredients satisfy the requirements set out under this Standard have been used.			X	3, 4, 5, 6, 7, 8	A, B, C, D, E
The terms referred to in paragraph 1 shall not be used for a product for which it has to be indicated in the labelling or advertising that it contains GMOs, consists of GMOs or is produced from GMOs.			X	3, 4, 5, 6, 7, 8	A, B, C, D, E
As regards processed food, the terms referred to in paragraph 1 have been used: (a) in the sales description, of a product that: (i) the processed food does not comply with point 3.13;		X		1, 2, 3	A
As regards processed food, the terms referred to in paragraph 1 have been used: (a) in the sales description, of a product that: (ii) the 95 % by weight threshold, of its ingredients of agricultural origin that should be organic has not been met;		X		1, 2, 3	A
As regards processed food, the terms referred to in paragraph 1 have been used: (b) not only in the list of ingredients, provided that the food does not comply with point 3.13(1), 3.13(2)(a), 3.13(2)(b) and 3.13(2)(d);		X		1, 2, 3	A
As regards processed food, the terms referred to in paragraph 1 have been used:		X		1, 2, 3	A

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
(c) not only in the list of ingredients and in the same visual field as the sales description, when: (i) the main ingredient is a product of hunting or fishing;					
As regards processed food, the terms referred to in paragraph 1 have been used: (c) not only in the list of ingredients and in the same visual field as the sales description, when: (ii) it contains other ingredients of agricultural origin that are not all organic;		X		1, 2, 3	A
As regards processed food, the terms referred to in paragraph 1 have been used: (c) not only in the list of ingredients and in the same visual field as the sales description, when: (iii) the food does not comply fully or partly with Article 3.13(1), 3.13(2)(a), 3.13(2)(b) and 3.13(2)(d).		X		1, 2, 3	A
The list of ingredients does not indicate which ingredients are organic.		X		1, 2	A
In the case where points (b) and (c) of this paragraph apply, the references to the organic production method appear in relation to the organic ingredients and the list of ingredients without including an indication of the total percentage of organic ingredients in proportion to the total quantity of ingredients of agricultural origin.		X		1, 2	A
The terms and the indication of percentage referred to in the previous subparagraph do not appear in the same colour, identical size and style of lettering as the other indications in the list of ingredients.		X		1, 2	A
4.2. Compulsory indications					
1. Where terms as referred to in point 4.1(1) have been used: (a) the code number referred to in point 5.1(10) of the control authority or control body to which the operator who has carried out the most recent production or preparation operation is subject, does not appear in the labelling;		X		1, 2, 3, 4	A
1. Where terms as referred to in point 4.1(1) have been used: (c) where the European Community logo is used, an indication of the place where the agricultural raw materials of which the product is composed have been farmed, does not appear in the same visual field as the logo and in the following forms, as appropriate: — ‘EU Agriculture’, where the agricultural raw material has been farmed in the EU, — ‘non-EU Agriculture’, where the agricultural raw material has been farmed in third countries, — ‘EU/non-EU Agriculture’, where part of the agricultural raw materials has been farmed in the Community and a part of it has been farmed in a third country. The abovementioned indication ‘EU’ or ‘non-EU’ may be replaced or supplemented by a country in the case where all agricultural raw materials of which the product is composed have been farmed in that country. For the abovementioned ‘EU’ or ‘non-EU’ indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2% of the total quantity by weight of raw materials of agricultural origin. The abovementioned ‘EU’ or ‘non-EU’ indication shall not appear in a colour, size and style of lettering more prominent than the sales description of the product. The use of the European Community logo as referred to in point 4.3(1) and the indication referred to in the first subparagraph shall be optional for products exported from third countries to the European Union. However, where the European Community logo as referred to in point 4.3(1) appears in the labelling, the indication referred to in the first subparagraph shall also appear in the labelling.		X		1, 2, 3, 4	A
2. The indications referred to in paragraph 1 are not marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.		X		1, 2, 3, 4	A
4.3. Organic production logos					
The European Community organic production logo has been used in the labelling, presentation and advertising of products which do not satisfy the requirements set out under this Standard. The European Community logo has been used in the case of in-conversion products and food as referred to in point 4.1(4)(b) and (c).		X		1, 2, 3, 4	A
4.5. Organic logo of the EU					
The organic production logo of the European Union (hereinafter ‘Organic logo of the EU’) does not follow the model set out in Annex V of EU regulation 848/2018 and its updates and consolidated versions as well as Part A of Annex VI in EGYCERT Production Standard and Control Measures. For the purpose of labelling, the organic logo of the EU shall only be used if the product concerned is produced in accordance with the requirements of this Standard, by operators who comply with the requirements of the control system referred to in Section 5 of the Standard. The “Organic logo of the EU” shall only be used to certified organic products that are exported to the European Union.		X		1, 2, 3, 4	A
5. General					

Description on Non-Compliance	Critical	Major	Minor	Measures	Sanctions
Denied access to operator documentation and accounting in the cases provided for by law	X			3,5,8	A,B,C,D,E
Denied access to operator facility			X	2	warning
Incomplete of Documentation required by EGYCERT			X	2	warning
Failure to notify EGYCERT of complete changes that happens to the operation and sending all necessary documents			X	2	warning
Intentional omission of information leading to incomplete records	X			3,5,8	A,B,C,D,E
Intentional re-labelling of downgraded products as organic	X			3,5,8	A,B,C,D,E
Intentional mixing organic with in-conversion or non-organic products	X			3,5,8	A,B,C,D,E
The operator didn't apply for COI before departure of the goods			X	2	warning
6. For Producer group					
Major deficiencies in imposing appropriate measures or carrying out the necessary follow-up in response to non-compliance identified by the ICS inspectors or by EGYCERT;	X			3,5,8	A,B,C,D,E
Minor deficiencies in the internal control system			X	2	warning
Major deviations in findings between internal inspections carried out by the ICS inspectors and official controls carried out by EGYCERT;	X			3,5,8	A