

Comparison of the requirements of the IFOAM Accreditation Criteria and the requirements of ISO/IEC Guide 65

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This comparison was carried out by the International Organic Accreditation Services (IOAS) on commission from the International Federation of Organic Agriculture Movements (IFOAM) The project was supported by I-GO, IFOAM's programme to develop organic agriculture in developing countries, funded by HIVOS of the Netherlands and the Dutch Government. The copyright belongs to IFOAM.

Introduction

The comparison uses a format that is based on defining the subject matter contained in both the IAC and ISO 65 standards. The subject matter is classified into a hierarchy of subject, category and sub category. The text of the two norms addressing the sub-category are then entered side by side. The purpose of so doing is to allow for a cross comparison rather than a simple “one-way” gap analysis.

While for the most part this system allows for easy cross comparisons the subject matter in the standards is not always compartmentalized into the same classifications. In some cases this has meant that only a sentence from a clause has been extracted from the standard. In other cases it has meant that several clauses have had to be entered against one sub-category.

The categorization of the subject matter has by and large followed that of the IAC. This resulted partly from the fact that the IAC is a longer document and contains a number of subjects not contained within ISO 65, but also because the IAC document is less repetitive than ISO65.

The study is confined to a comparison of the following two documents:

- The IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing approved by the IFOAM World Board August 2002 and contained in the IFOAM Norms for organic production and processing published in 2002. (IAC)
- ISO/IEC GUIDE 65:1996(E) General Requirements for Bodies Operating Product Certification Systems (ISO65)

The comparison does not include:

- The IFOAM Accreditation Criteria Guidance Notes published in the same IFOAM Norms
- The International Accreditation Forum Guidance on the Application of ISO/IEC Guide 65: 1996 published in March 1999
- Other related ISO Guidelines such as ISO10011-1 “Guidelines for auditing quality systems Part 1: Auditing” and “ISO 11000-2 Guidelines for auditing quality systems Part 2: Qualification criteria for quality system auditors”

In a few instances these documents have been mentioned in the comparison for reference purposes. Those using the comparisons should be aware that these documents may contain requirements indicated as absent from the documents being compared.

It should be noted that the introduction to ISO/IEC Guide 65 states that: “the requirements contained in this Guide are written, above all, to be considered as general criteria for organizations operating product certification systems; they may have to be amplified when specific industrial or other sectors make use of them.” The introduction to the IFOAM Accreditation Criteria states the “the criteria have been strictly based upon the requirements in ISO/IEC Guide 65: 1996(E)..... However organic certification is certification of a process and not a product and this has required some adaptation. In addition these criteria include specific

requirements concerning issues confronted by a certification body operating within the organic sector.”

The differences highlighted in this comparison should be viewed in the context of the above statements.

While every effort has been made to be accurate, the detailed nature of the study may have resulted in some errors. Corrections would be appreciated and should be addressed to the IOAS.

The following codes have been used in the comparison:

Identical - the text is identical or has only grammatical differences

Idem - While the wording is different the differences are not of concrete substance. The touchstone used is whether an additional element for verification can be identified.

Additional - Both standards deal with the subject matter but the text of one standard has additional requirements absent in the other. This may be ISO65 additional requirement (ISO65 requires an element not required by IAC) or IAC additional requirement (IAC requires an element not required by ISO65) or both

Not addressed by ... - The one standard does not address the issue in any form.

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10th July 2003

1. STRUCTURE

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---------------------------------|---|---------|---|---------|--|
| 1.1 general requirements | | | | | |
| | 1.1.1 documented structure | 1.1.1 | The certification body shall have a documented and effective structure and organization that provides confidence in its certification. | 4.2 | The structure of the certification body shall be such as to foster confidence in its certifications |
| Comparison: IDEM | | | Comment: The IAC requirement that the structure should be documented is found elsewhere in ISO 65, particularly in sub-clauses of 4.2 and in 4.5.3 | | |
| | 1.1.2 Legal status | 1.1.2 | The certification body shall have documents which demonstrate it is a legal entity. | 4.2.d | The certification body shall have documents which demonstrate it is a legal entity |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.1.3 Identification of responsibility | 1.1.3 | The certification body shall identify the management (committee, group or person) which shall have overall responsibility for all of the following: a. performance of testing, inspection, evaluation and certification as defined in this Guide, b. formulation of policy matters relating to the operation of the certification body, c. decisions on certification, d. supervision of the implementation of its policies, e. supervision of the finances of the body, | 4.2.c | The certification body shall identify the management (committee, group or person) which shall have overall responsibility for all of the following: 1) performance of testing, inspection, evaluation and certification as defined in this Guide, 2) formulation of policy matters relating to the operation of the certification body, 3) decisions on certification, 4) supervision of the implementation of its policies 5) supervision of the finances of the body, 6) delegation of authority to committees or individuals as required to undertake defined activities on its behalf, |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|-------------------------------|---------|--|---------|--|
| | | | f. delegation of authority to committees or individuals as required to undertake defined activities on its behalf, g. technical basis for granting certification,- | | 7) technical basis for granting certification,- |
| Comparison: IDENTICAL | | | Comment: | | |
| 1.2 responsibility | | | | | |
| | 1.2.1 Retained responsibility | 1.2.1 | The certification body shall take full responsibility for all activities operated or sub-contracted out and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification. | 4.2.b | The certification body shall be responsible for decisions relating to its granting, maintaining, extending, suspending and withdrawing of certification |
| | | 1.2.2 | The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body. | 4.4.a | The certification body shall take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification |
| | | | | 12.2 | The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body. |
| Comparison: IDEM | | | Comment: | | |
| | 1.2.2 Admin. description | 1.2.3 | The certification body shall have a documented description of its administration, including officers and responsibility. The certification body shall define clear lines of authority and | 4.2 | c) the names, qualifications, experience and terms of reference of the senior executive and other certification personnel, both internal and external; d) an organization chart showing lines of authority, responsibility and allocation |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|--------------------|---|---------|---|
| | | | responsibility and the accountability of staff and committees. | | of functions stemming from the senior executive; |
| Comparison: IDEM | | | Comment: The ISO65 requirements are stated elsewhere in the IAC. The IAC makes this additional statement but it to all intents and purposes covered by 4.2c & 4.2d | | |
| ISO 65 to IAC compare | | | Comment: | | |
| | 1.2.3 delegation & committee Terms of Ref | 1.2.4 1.2.5 | The Governing Board shall remain responsible for certification decisions but may delegate authority for taking certification decisions to one or more certification committees. When activities are delegated to committees, such committees shall have clear responsibilities and rules of procedures. | 4.2.n | (The certification body shall) have formal rules and structures for the appointment and operation of any committees which are involved in the certification process |
| Comparison: IDEM | | | Comment :ISO 65 does not state that the board remains responsible but this is anyway a legal norm. | | |
| ISO 65 to IAC compare | | | Comment: | | |
| | 1.2.4 oversight of individual decisions | 1.2.6 | Where decisions are further delegated to individual certification officers, the certification body shall have reporting and review procedures that enables the Board or the certification committee to exercise control over and responsibility for such decisions. | | |
| Comparison: Not addressed by ISO65 | | | Comment: The IAC specifically requires exercising of oversight over certification officers | | |
| 1.3 impartiality and objectivity (structure) | | | | | |
| | 1.3.1 | 1.3.1 & | The certification body shall have structures | 4.2.a | The certification body shall be impartial |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|-----------------------------------|---------|--|----------------------|--|
| | Overall impartiality requirements | 1.3.2 | and procedures to enable it to be free to operate without undue influence from vested interests. The certification body shall be impartial. Inspection and certification shall be based on an objective assessment of relevant factors, following documented procedures. | 4.2.e 12.1 | The certification body shall have a documented structure which safeguards impartiality including provisions to ensure the impartiality of the operations of the certification body The decision as to whether or not to certify a product shall be taken by the certification body on the basis of the information gathered during the evaluation process and any other relevant information. |
| Comparison: IDEM | | | Comment: While language may differ the content is the same | | |
| | 1.3.2 Stakeholder participation | 1.3.3 | The certification body structure shall enable the participation of all parties significantly affected by the policies, principles and functioning of the certification system, in their development. | 4.2.e | this structure shall enable the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system |
| Comparison: IDENTICAL | | | Comment: | | |
| ISO 65 to IAC compare | | | Comment: | | |
| | 1.3.3 Other activities of CB | 1.3.4 | The certification body shall not provide any product or service which could compromise the confidentiality, objectivity or impartiality of its certification process and decision making, unless these are clearly separated in a manner that ensures that such compromise cannot occur. | 4.2.o.3 4.2.1 | (the certification body shall not) provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions The certification body..... shall have policies and procedures that distinguish between product certification and any |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|---|
| | | | | | other activities in which the certification body is engaged., |
| Comparison: ISO65 additional requirement | | | Comment: The requirement that there be policies and procedures to distinguish between product and other certification is not a requirement of IAC. In most, but not all, cases organic certification bodies do not engage in non product (process) certification. | | |
| | 1.3.4 Marketing activities | | The certification body shall not engage in the marketing of certified products or promotion of individual products and shall have a procedure for responding to inquiries from the trade or consumers. The procedure shall ensure an equal treatment for all certified product. The certification body shall not solicit individual applications based on the needs of individual buyers. | 4.2.o.1 | (The certification body shall not) supply or design products of the type it certifies |
| Comparison: IAC additional requirement | | | Comment: The IAC is far more detailed and refers to marketing and not just design and supply. It also regulates the resonance of certifiers to inquiries about certified products | | |
| | 1.3.5 Activities of related bodies | 1.3.6 | Certification bodies shall ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications. | 4.2.0 | (The certification body shall) ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications, |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.3.6 Structure of certification committee | 1.3.7 | The body making or ratifying certification decisions shall be free from any commercial, financial and other pressures that might influence decisions; a structure where members are chosen to provide a | 4.2.n | such committees shall be free from any commercial, financial and other pressures that might influence decisions; a structure where members are chosen to provide a balance of interests where no single |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--------------------------------------|-----------------|--|---------|---|
| | | | balance of diverse stakeholder interests and where no single interest predominates shall be deemed to satisfy this provision; Such diversity shall include that at least one general interest is represented such as consumers, scientists or environmentalists. | | interest predominates will be deemed to satisfy this provision |
| Comparison : IAC additional requirement | | | Comment: ISO65 does not specify the nature of the balance of interest. The IAC refers to stakeholders but also requires at least general interest from outside the organic industry. | | |
| | 1.3.7 Fee system & impartiality | 1.3.8 &1.3.9 | Payment of inspection fees and expenses shall be made through the certification body or contracted inspection body and not directly to the inspector by the operator. * The fee structure shall be such that a decision to not grant certification does not result in unreimbursed costs to the certification body. | | |
| Comparison | | | Comment: | | |
| 1.4 impartiality and objectivity -division of function | | | | | |
| | 1.4.1 General function separation | 1.3.11 | The certification body shall have clear division of the functions of inspection, certification and appeals. | 4.2.f | ensure that each decision on certification is taken by a person(s) different from those who carried out the evaluation: |
| Comparison: IAC additional requirement | | | Comment: IAC requires that the appeals are also subject to the division of function principle | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------|--|---------|---|
| | 1.4.2 Appeals personnel | 1.3.12 | Persons responsible for a decision that is being appealed may not be involved in the decision on that appeal. | | |
| Comparison: Not addressed by ISO65 | | | Comment: | | |
| | 1.4.3 Division inspection and decision | 1.3.13 | The certification body shall ensure that each decision on certification is taken by person(s) different from those who carried out the inspection. | 4.2.f | (The certification body shall) ensure that each decision on certification is taken by a person(s) different from those who carried out the evaluation: |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.4.4 Division pre-assessment and decision | 1.3.14 | Where pre-assessment of production to identify areas of nonconformity is performed as an optional fee paying part of the certification process, different personnel shall carry out the inspection and the pre-assessment. | | |
| Comparison | | | Comment: | | |
| 1.5 impartiality and objectivity -consulting and advising | | | | | |
| | 1.5.1 Consulting | 1.3.15 | Certification bodies shall not provide consultancy services to operators. | 4.2.o.2 | (The certification body shall not) give advice or provide consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification requested |
| Comparison: IAC additional | | | Comment: The IAC prohibits all consultancy directed to operators. The ISO65 prohibition is | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|-----------------------------------|---------|--|---------|---|
| requirement | | | limited to consultation on overcoming barriers to the requested certification. | | |
| | 1.5.2 Advice of inspectors | 1.3.16 | Specific advice given by inspectors to operators shall be limited to explanations of the standards or certification requirements. This information shall not be offered for additional fees and shall not prescribe solutions. | 4.2.o.2 | (The certification body shall not) give advice or provide consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification requested |
| Comparison: IDEM | | | Comment: The IAC requirement specifically refers to inspectors while the ISO65 refers to the certification body. However , it is reasonable to presume this also covers a contracted inspector . | | |
| | 1.5.3 Generic information | 1.3.17 | Certification bodies may provide general information (training, newsletters, seminars, advice concerning regulatory requirements etc.) for additional fees, provided this service shall be offered to all certified operators in a nondiscriminatory manner. | | |
| Comparison: Not addressed by ISO65 | | | Comment: 4.2.o.2 does not regulate advise outside of matters which are barriers to the certification requested | | |
| 1.6 Conflict of interest of individuals | | | | | |
| | 1.6.1 Declarations of interest | 1.3.18 | A declaration of interest updated annually by the Board and all persons involved in certification, inspection and appeals shall be on file at the certification body's (or inspection body's) office. Such declarations shall take into account both direct and indirect interests and the certification body shall decide on what constitutes a conflict. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|----------------------------|---------|---|------------------------|---|
| Comparison: Not addressed by ISO65 | | | Comment: ISO 65 5.2.2b (see subcategory 1.6.3 below) requires a declaration on assignment. IAC requires a declaration of all interests in the organic industry. The difference may be attributed to the sector specific nature of the IAC. | | |
| | 1.6.2 Exclusion from work | 1.3.19 | All persons with a conflict of interest shall be excluded from work, discussion and decisions in all stages of the certification process related to the potential conflict. The exclusion of such persons should be recorded in minutes or other records. | 4.2.m | The certification body shall...together with its senior executive and staff, be free from any commercial, financial and other pressures which might influence the results of the certification process: |
| Comparison: IDEM | | | Comment: Although the ISO requirement appears to be mandating that persons with conflicts should not be employed, IAF guidance G4.24 clarifies that the intent is the same as the IAC requirement | | |
| | 1.6.3 Agreement to abstain | 1.3.20 | The certification body shall require persons engaged in inspection or certification to agree in writing to abstain from participating in work for operators with whom they have personal relations or to those with whom they have had business relationships (either trade or advisory) in the past two years. The certification body shall require persons engaged in inspection to report on any new interests regarding the operation for a period of one year after the inspection. The certification body shall determine whether the new relations may have affected the impartiality of any work submitted. | 5.2.2 a 5.2.2 b | to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interest; to declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designer of products to the evaluation or certification of which they are to be assigned. |
| Comparison: IAC additional requirement | | | Comment: ISO65 does not refer to the number of years but this is stated as 2 years in the IAF guidance note. The IAC also regulates conflicts that arise following the work and this is not addressed in the ISO65 | | |
| 1.7 Resources | | | | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|-----------------------------------|---------|--|--------------|---|
| | 1.7.1 Financial resources | 1.4.1 | The certification body shall have the financial stability and resources required for the operation of a certification system. | 4.2.i | have the financial stability and resources required for the operation of a certification system |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.7.2 liability coverage | 1.4.2 | The certification body shall make adequate provision to cover liabilities which may arise from its operational activities. | 4.2.h | (The certification body shall) have adequate arrangements to cover liabilities arising from its operations and/or activities |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.7.3 Overall personnel resources | 1.4.3 | The certification body shall employ or contract a sufficient number of personnel who have the necessary education, training, technical knowledge and experience for performing certification functions relating to the type, range and volume of work performed. | 4.2.j | employ a sufficient number of personnel having the necessary education, training, technical knowledge and experience for performing certification functions relating to the type, range and volume of work performed, under a responsible senior executive |
| Comparison: IDENTICAL | | | Comment: | | |
| | 1.7.4 Recruitment requirements | 1.4.4 | The certification body shall have documented recruitment requirements for senior staff and inspectors regarding necessary education, training, technical knowledge and experience in organic agriculture and/or processing. In the case of inspectors the certification body shall specify the type of inspections for which the inspector has been employed based on these factors. | 4.3 5.2.1 | In conducting its certification operations, the certification body shall observe, as appropriate, the requirements for the suitability and competence of body(ies) or person(s) carrying out testing, inspection and certification/registration as specified in ISO/IEC Guides 25, 39 and 62 In order to ensure that evaluation and certification are carried out effectively and uniformly, the minimum relevant criteria |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|--------------|--|---------|---|
| | | | | | for the competence of personnel shall be defined by the certification body |
| Comparison: ISO65 additional requirement | | | Comment: The reference to other ISO/IEC Guides constitutes additional requirements to the IAC | | |
| | 1.7.5 Job descriptions | 1.4.5 | Personnel shall have available clear job descriptions describing their duties and responsibilities. | 5.1.2 | Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. |
| Comparison: IDEM | | | Comment: The IAC requires both descriptions of duties and responsibilities (job description) and in 1.4.6 below, work instructions (detailed procedures/ checklists). Whether ISO 65 requires the latter depends on interpretation | | |
| | 1.7.6 Work instructions | 1.4.6 | Personnel shall have the competence and up-to-date, documented work instructions to enable them to perform their various functions. | 5.1.2 | . Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. |
| Comparison: IDEM | | | Comment: The IAC requires in 1.4.5 above both descriptions of duties and responsibilities (job description) and in 1.4.6 work instructions (detailed procedures/ checklists). Whether ISO 65 requires the latter depends on interpretation | | |
| | 1.7.7 Decision making competence | 1.4.7 | The body or committee responsible for making certification decisions shall ensure that all certification decisions are based on competence in all areas for which certification is granted. * | 5.1.1 | The personnel of the certification body shall be competent for the functions they perform, including making require technical judgements, framing policies and implementing them. |
| Comparison: IDEM | | | Comment: | | |
| | 1.7.8 Personnel commitment to policies | 1.4.8 | The certification body shall require all personnel involved in the certification process to sign a contract or other document by which they commit themselves to the rules and procedures of the certification body | 5.2.2 | The certification body shall require its personnel involved in the certification process to sign a contract or other document by which they commit themselves |
| Comparison: IDENTICAL | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | 1.7.9 Training policy | 1.4.9 3.3.1 | The certification body shall have a documented training policy, including initial and ongoing training, for all personnel including staff, both employed and contracted inspectors, and committee members sufficient to ensure continued competence. The policy manual shall contain i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance; | 4.2.1 | (policy manual) shall contain..... the procedure for the recruitment, selection and training of certification body personnel |
| Comparison: IAC additional to ISO65. | | | Comment: The IAC is more specific in requiring both initial and ongoing training | | |
| | 1.7.10 Inspector training | 1.4.10 | The certification body shall ensure that prior to undertaking inspection, new inspectors have at least successfully completed a training course in inspection of organic operations and undergone a defined on-site apprenticeship period. | | See ISO 10011-2 |
| Comparison: IAC additional requirement | | | Comment: ISO 65 does not refer to the ISO Guide 10011-2 which contains similar requirements to those in the IAC | | |
| | 1.7.11 Personnel records | 1.4.11 | Records of the qualifications, training and performance reviews of all personnel shall be maintained by the certification body in accordance with the requirements in 5.4.6. | 5.2.3 | Information on the relevant qualifications, training and experience of each member of the personnel involved in the certification process shall be maintained by the certification body. Records of training and experience shall be kept up to date, in particular the following: a) name and address; |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|---------------|---|---------|---|
| | | | | | b) organization affiliation and position held; c) educational qualification and professional status. d) experience and training in each field of the certification body's competence; e) date of most recent updating of records-, f) performance appraisal |
| Comparison: ISO 65 additional requirement | | | Comment: The ISO requirement is more specific, itemizing the nature of the records | | |
| | 1.7.12 Subcontractor responsibility | 1.4.12 | The integrity, competence and transparency of any sub-contracted components of the certification system remain the responsibility of the certification body | 4.4.b | (The certification body shall) ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing, inspection or other technical activities (see clause 2), and is not involved either directly or through the person's employer with the design or production of the product in such a way that impartiality would be compromised; |
| Comparison: IDEM | | | Comment: Taken together with sub-category 1.4.13 the IAC and ISO 65 requirements do not differ in substance. The IAC 1.4.13 requires the agreement with the subcontracted party to contain the requirement to comply with all aspects of the criteria. This would include competency and issues regarding conflict of interest. The essential difference is that the IAC requires this catch all requirement to be in the agreement while ISO65 specifies only that confidentiality and conflict of interest is included in the agreement. Nevertheless, 4.4.b of ISO 65 requires the CB “ensures” all aspects of the requirements are met. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|-------------------------|-----------------------------------|---------|--|------------------|---|
| | 1.7.13 subcontractors agreement | 1.4.13 | When a certification body subcontracts work related to certification to an external body, or person, an agreement covering the arrangements shall be drawn up. This shall include the requirement to comply with all relevant aspects of these criteria. | 4.4 5.2.2 | When a certification body decides to subcontract work related to certification (e.g. testing or inspection) to an external body or person, a properly documented agreement covering the arrangements including confidentiality and conflict of interest shall be drawn up. The certification body shall ensure that, and document how, any contracted personnel for their own part, and on the part of their employer if any, satisfy all the requirements for personnel outlined in this Guide. |
| Comparison: IDEM | | | Comment: Taken together with subcategory 1.4.12 the IAC and ISO 65 requirements do not differ in substance. The IAC 1.4.13 requires the agreement with the subcontracted party to contain the requirement to comply with all aspects of the criteria. This would include competency and issues regarding conflict of interest. | | |
| | 1.7.14 Subcontracting decisions | 1.4.14 | The certification decision shall not be subcontracted. The certification body shall take full responsibility for all activities operated or sub-contracted out and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification. | 4.4.a | maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification; |
| Comparison: IDEM | | | | | |
| | 1.7.15 Subcontractor notification | 1.4.15 | The certification body shall ensure that operators are informed of subcontracting arrangements prior to application. | 4.4 | When a certification body decides to subcontract work.....(it shall) obtain the applicants consent |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|----------------|---|-----------|---|
| Comparison: IDEM | | | Comment: The requirements in the two norms differ . The IAC assumes that any work that is subcontracted is done on a regular basis and therefore the applicant may give their consent by (for example) accepting this arrangement in signing the application form. The text in ISO65 assumes that the subcontracted work is not part of the system but that the certification body may decide to subcontract it - in which case consent must be obtained. | | |
| | 1.7.16 Acceptance of prior certification | 1.4.16. | The certification body shall apply the requirements in 1.4.12 to 1.4.15 above when it uses, for granting its own certification, work performed by another certification body. Specific criteria for such cases are set down in section 9 of this document. * | 4.4 notes | 2 Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) and satisfy itself regarding the matters detailed in 4.4 b) - 3 The requirements given in 4.4 a) and b) are also relevant, by extension, when a certification body uses, for granting its own certification, work performed by another certification body with which it has signed an agreement |
| Comparison: IAC additional requirement | | | Comment: The reference to section 9 of the IAC greatly extends the requirements related to acceptance of work previously undertaken by another certification body | | |

2. ACCESSIBILITY AND SCOPE

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|-------------------------------|------------------|---------------|---|--------------------|---|
| 2.1 nondiscrimination | | | | | |
| | 2.1.1 General | 2.1.1. | The policies and procedures which govern the operation of the certification body shall be non-discriminatory. The administration of those policies and procedures shall not discriminate in any way against particular applicants. | 4.1.1. | The policies and procedures under which the certification body operates and their administration shall be non-discriminatory and shall be administered in a non-discriminatory manner. Procedures shall not be used to impede or inhibit access by applicants, other than as provided for in this Guide |
| Comparison: IDEM | | | Comment: | | |
| 2.2 access to services | | | | | |
| | 2.2.1 general | 2.2.1. | The certification body shall make its services accessible for all applicants whose activities fall within its declared field of application. Certification requirements, inspections and decisions shall be confined to the scope of the certification being granted. | 4.1.2 4.1.4 | The certification body shall make its services accessible to all applicants whose activities fall within its declared field of operation. There shall not be undue financial or other conditions. The certification body shall confine its requirements, evaluation and decision on certification to those matters specifically related to the scope of the certification being considered |
| Comparison: IDEM | | | | | |
| | 2.2.2 | 2.2.2. | Access to certification shall not be conditional upon the size of the supplier or | 4.1.2 | Access shall not be conditional upon the size of the supplier or membership of any |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--------------------------------|---------------|---|---------|---|
| | Non-discriminatory application | | membership of any association or group, nor shall certification be conditional upon the number of certificates already issued by the certification body. | | association or group, nor shall certification be conditional upon the number of certificates already issued. |
| Comparison: IDENTICAL | | | Comment: | | |
| | 2.2.3 Fee structure | 2.2.3. | The fee structure shall be standardized and available on request. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.2.4 Access -language | 2.2.4. | The certification body shall state under its declared field of application, those languages in which it operates. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 2.3 certification scope -chain of Custody | | | | | |
| | 2.3.1 Standards | 2.3.1. | Organic certification shall be granted solely on the basis of conformity with specified published standards. The standards used by the certification body shall cover all production systems or product categories certified. | 4.1.3 | The criteria against which the products of a supplier are evaluated shall be those outlined in specified <i>standards</i> . |
| Comparison: IAC additional requirement | | | Comment: IAC introduces the notion of production systems. This is an additional requirement | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--------------------------------------|---------------|---|-----------|---|
| | | | related to sector specific concerns viz that certifiers may not, for example, certify wild products or eating establishments without related standards. | | |
| | 2.3.2 Scope and the chain of custody | 2.3.2. | The certification body shall not issue any license to affix its mark or issue any certificate for any product unless it is assured of the chain of custody of the product to that point. Where steps in the production chain have been certified by other certification bodies, the criteria in section 9 shall be applied. | 4.4 notes | 2 Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) and satisfy itself regarding the matters detailed in 4.4 b) - 3 The requirements given in 4.4 a) and b) are also relevant, by extension, when a certification body uses, for granting its own certification, work performed by another certification body with which it has signed an agreement |
| Comparison: Additional IAC requirement | | | Comment: The IAC requirement regarding the chain of custody is absent from ISO65. In addition the reference to section 9 of the IAC greatly extends the requirements related to acceptance of work previously undertaken by another certification body | | |
| | 2.3.3 Scope Certifiable entities | 2.3.3. | Any entity that has produced, processed, packaged or affixed a label referring to the organic production method to a product shall have been certified. Subcontracted production (see below) shall have been inspected. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.3.4 Scope- limit of chain | 2.3.4. | The certification body is not obliged to have a system for inspection of products that are further handled after being packed in the final consumer package. | | |
| Comparison: Not addressed by ISO | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------------|--|---------|----------|
| 65 | | | | | |
| | 2.3.5 Scope- Previous sellers | 2.3.5. | Any entity that has previously sold the product shall have been certified except when the product had been received packaged for final consumer use. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.3.6 Scope - storage | 2.3.6. | Certification bodies shall conduct a risk assessment to determine the necessity for, or frequency of, inspection of all storage facilities including port facilities. Where this reveals a need for inspection to protect organic integrity, inspection shall be done. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| ISO 65 to IAC compare | | | Comment: | | |
| | 2.3.7 Scope- transport | 2.3.7. | The certification body shall require that the party owning the product at the point of transport be responsible for maintaining the organic integrity in the transport process, unless transport operations are certified in their own capacity. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.3.8 Scope -transfer to other CB | 2.3.8. | For certified product not in its final packaging the certification body's responsibility shall extend to the point | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|----------------|--|---------|----------|
| | | | where the product is sold to an operator certified by a different entity. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 2.4 Certification Scope - subcontracted production | | | | | |
| | 2.4.1 Subcontractor policies | 2.3.9. | The certification body shall have policies and procedures for regulating contracted production or processing, where the contracted party is not required to be certified in their own right. A certification body may not issue a certificate of any type to the contracted operator. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.4.2 Scope limitation on subcontractors right | 2.3.10. | The policy shall prescribe the circumstances where the contracted party is not required to be themselves certified. This shall preclude the contracted party from marketing certified products themselves and require the manufacturing process, the raw materials supply, and the sales to be under the control of the certified licensee. This shall normally mean that the contracted party does not take title of the product. * | | |
| Comparison: Not addressed by ISO | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|----------------|--|---------|----------|
| 65 | | | | | |
| | 2.4.3 Scope inspection of subcontractors | 2.3.11 | The contracted party shall be inspected at least annually according to the certification body's normal inspection procedures; * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.4.4 Scope - responsibility for contracted work | 2.3.12. | The certification body shall require that the certified operator shall be held fully responsible for the contracted production or processing and be subject to sanctions in the event of noncompliance of the contracted parties; * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 2.4.5 Contracts with subcontracted entities | 2.3.13 | The certification body shall require that the contracted party have a contractual relationship with the certification body that includes clauses regarding compliance to the standards, obligation to provide information, and access to the certification body. This may either be achieved through a direct contract between the parties or by an agreement between the operator and the contracted party in which the contracted party binds itself directly to the certification body. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---------------------------------------|---------------|---|---------|----------|
| | 2.4.6 Documents for subcontractors | 2.3.14 | The certification body shall require that each contracted party has the current version of the applicable standards and a general description of the certification program. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

3. QUALITY SYSTEM

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|---------------------------------------|---------|---|--------------------|---|
| 3.1 quality policy | | | | | |
| | 3.1.1 Quality Policy | 3.1.1 | The management of the certification body having executive responsibility for quality shall define and document its policy for quality and its objectives for, and commitment to, quality. | 4.5.1 | The management of the certification body having executive responsibility for quality shall define and document its policy for quality and its objectives for, and commitment to, quality |
| Comparison: IDENTICAL | | | Comment: | | |
| | 3.1.2 Quality Policy understanding | 3.1.2 | The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization. | 4.5.1 | The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization. |
| Comparison: IDENTICAL | | | Comment: | | |
| 3.2 quality system | | | | | |
| | 3.2.1 Documented Quality system | 3.2.1. | The certification body shall operate an effective quality system in accordance with the relevant elements of these criteria and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available to, and understood by, the certification body staff. | 4.2.k 4.5.2 | have a quality system giving confidence in its ability to operate a certification system for products The certification body shall operate an effective quality system in accordance with the relevant elements of this Guide and appropriate for the type, range and volume of work performed. This quality |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|---|---------|---|---------|--|
| | | | | | system shall be documented and the documentation shall be available for use by the certification body staff. |
| Comparison: IDEM | | | Comment: ISO65 4.2.k does not add any requirement not in ISO65 4.5.2 and IAC 3.2.1 | | |
| | 3.2.2 Implementation of Quality System | 3.2.2. | The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. Certification bodies shall demonstrate a high degree of competency and consistency in the practical application of their policies and procedures. | 4.5.2 | The certification body shall ensure effective implementation of the documented quality system, procedures and instructions |
| Comparison: IDEM | | | Comment: The second sentence of IAC does not add any requirement of substance | | |
| | 3.2.3 Quality Manager | 3.2.3 | The certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for ensuring that a quality system is established, implemented and maintained in accordance with these criteria, and reporting on the performance of the quality system to the body's management for review and as a basis for improvement of the quality system. | 4.5.2 | The certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for a) ensuring that a quality system is established, implemented and maintained in accordance with this Guide, and b) reporting on the performance of the quality system to the body's management for review and as a basis for improvement of the quality system |
| Comparison: IDENTICAL | | | Comment: | | |
| | 3.2.4 | 3.2.4. | The certification body shall demonstrate | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---------------------------|----------------------------------|---------|--|---------|--|
| | Quality improvement | | adequate arrangements for continuous quality improvement | | |
| Comparison: IDEM | | | Comment: ISO 65 point 4.2.5b (see sub-category 3.2.3 above) could be considered to address the same requirement. In addition the requirements for complaints against the certification body requires that corrective actions be considered | | |
| 3.3 quality manual | | | | | |
| | 3.3.1 Quality Manual contents | 3.3.1. | <p>The quality system shall be documented in a comprehensive Quality Manual and associated quality procedures, and the manual shall contain or refer to at least the following:</p> <ul style="list-style-type: none"> a) a quality policy statement; b) a brief description of the legal status of the certification body, including the names of its owners and, if different, names of the persons who control it; c) the names, qualifications, experience and terms of reference of the Board of Directors, senior executive and other certification personnel, both internal and external; d) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive; e) a description of the organization of the certification body, including details of the management (committee, group or person) identified in 1.1.3; f) the policy and procedures for conducting management reviews; | 4.5.3 | <p>The quality system shall be documented in a comprehensive Quality Manual and associated quality procedures, and the manual shall contain or refer to at least the following:</p> <ul style="list-style-type: none"> a) a quality policy statement; b) a brief description of the legal status of the certification body, including the names of its owners and, if different, names of the persons who control it; c) the names, qualifications, experience and terms of reference of the Board of Directors, senior executive and other certification personnel, both internal and external; d) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive; e) a description of the organization of the certification body, including details of the management (committee, group or person) identified in 4.2.c.,its constitution, terms of reference and rules of procedure f) the policy and procedures for conducting management reviews; |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|----------|--------------|---------|---|---------|---|
| | | 1.2.5 | <p>g) administrative procedures including document control;</p> <p>h) the operational and functional duties and services pertaining to quality, so that the extent and limits of each person's responsibility are known to all concerned;</p> <p>i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance;</p> <p>j) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;</p> <p>k) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken;</p> <p>l) the procedures for evaluating products and implementing the certification process, including the conditions for issue, retention and withdrawal of certification documents, and the controls over the use and application of documents employed in the certification of products;</p> <p>m) the policy and procedure for dealing with appeals and complaints;</p> <p>n) its procedures for conducting internal audits.</p> <p>When activities are delegated to committees, such committees shall have clear responsibilities and rules of procedures</p> | | <p>g) administrative procedures including document control;</p> <p>h) the operational and functional duties and services pertaining to quality, so that the extent and limits of each person's responsibility are known to all concerned;</p> <p>i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance;</p> <p>j) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;</p> <p>k) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken taken;</p> <p>l) the procedures for evaluating products and implementing the certification process, including the conditions for issue, retention and withdrawal of certification documents, and the controls over the use and application of documents employed in the certification of products;</p> <p>m) the policy and procedure for dealing with appeals, complaints and disputes;</p> <p>n) its procedures for conducting internal audits, based on the provisions of ISO 10011-1.</p> |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|------------------------------|--------------------------------|---------------------|---|---------|--|
| Comparison: IDEM | | | Comment: ISO65 reference to ISO Guide 10011-1 requires only that the audit be based on the provisions of this document. This is subjective terminology and as such does not constitute a difference of substance | | |
| 3.4 internal audits | | | | | |
| | 3.4.1 internal audit | 3.4.1. | The certification body shall conduct periodic internal audits covering all procedures in a planned and systematic manner, to verify that the certification system is implemented and is effective. | 4.7.1 | The certification body shall conduct periodic internal audits covering all procedures in a planned and systematic manner, to verify that the quality system is implemented and is effective. |
| Comparison: IDENTICAL | | | Comment: | | |
| | 3.4.2 Internal audit follow-up | 3.4.1 | The certification body shall ensure that: a. personnel responsible for the audited functions are informed of the outcome of the audit; b. corrective actions are taken in a timely and appropriate manner; c. the results of the audit are documented. | 4.7.1 | The certification body shall ensure that a) personnel responsible for the area audited are informed of the outcome of the audit.' b) corrective action is taken in a timely and appropriate manner; and c) the results of the audit are documented, |
| Comparison: IDENTICAL | | | Comment: | | |
| | 3.4.3 System review | 3.4.2. 3.2.4 | The program's management shall review its system at defined intervals. Records of such reviews shall be maintained. | 4.7.2 | The body's management with executive responsibility shall review its quality system at defined intervals which are sufficiently short to ensure its continuing suitability and effectiveness in satisfying the requirements of this Guide and the |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------------------|--|---------|---|
| | | | The certification body shall demonstrate adequate arrangements for continuous quality improvement | | stated quality policy and objectives. Records of such reviews shall be maintained |
| Comparison: IDEM | | | Comment: While the IAC does not contain the ISO 65 qualifying statement regarding intervals between reviews, failure to fulfill the ISO statement would also constitute failure to fulfill the IAC requirement 3.2.4 | | |
| | 3.4.4 Performance review | 3.4.3. 3.3.1 | The certification body shall conduct performance reviews of all personnel including employed inspectors at least annually. Records of the outcome shall be maintained. The policy manual shall contain... i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance; | 4.5.3 | The policy manual shall contain...i) the procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance; |
| Comparison: IAC additional requirement | | | Comment: The IAC requirement for the reviews to be conducted annually is additional | | |
| | 3.4.5 Contracted inspector feedback | 3.4.4. | In the case of frequently used contracted inspectors the inspector shall be given periodic feedback on performance | | |
| Comparison: Not addressed by ISO 65 | | | Comment: ISO 65 (clause 4.4) and the IAC (clauses 1.4.12 and 1.4.13) require that the certification body ensures the performance of subcontracted parties, IAC 3.4.4 specifically requires that the inspector receive periodic feedback | | |
| 3.5 complaints | | | | | |
| | 3.5.1 Complaints procedure | 3.5.1. | The certification body shall have procedures for consideration of complaints brought by operators | 4.2.p | (The certification body shall) have policies and procedures for the resolution of complaints |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|-----------------------------------|---------|---|---------|---|
| | | | or third parties concerning its performance or concerning the compliance of certified operators with the standards. | 7.1 | Appeals, complaints and disputes brought before the certification body by suppliers or other parties shall be subject to the procedures of the certification body |
| Comparison: IDEM | | | Comment: the reference to appeals in ISO 65 clause 7.1 is dealt with in the IAC 7.8.1. The IAC differentiation of types of complaint is not found in ISO65. However it may be taken that the ISO requirement refers to all types. | | |
| | 3.5.2 Complaints timeliness | 3.5.2. | Complaints shall be dealt with in a timely and efficient manner. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 3.5.3 complaints resolution | 3.5.3. | When a complaint is resolved, a documented resolution shall be made. The complainant shall be informed of the general outcome of the complaint in way which does not prejudice the confidentiality of the party concerned. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 3.5.4 Complaints records | 3.5.4. | The certification body shall a. keep a record of all complaints and resulting corrective actions related to certification; b. take appropriate subsequent action; | 7.2 | Each certification body shall a) keep a record of all appeals, complaints and disputes and remedial actions relative to certification; b) take appropriate subsequent action: |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | c. document the action taken and its effectiveness. | | c) document the action taken and its effectiveness |
| Comparison: IDENTICAL | | | Comment: | | |

4. CONFIDENTIALITY PROVISIONS

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|--|
| 4.1 general | | | | | |
| | 4.1.1 confidentialiy arrangements | 4.1.1 | The certification body shall have adequate arrangements to ensure confidentiality of the information regarding specific operators obtained in the course of its certification activities at all levels of its organization, including committees, contracted bodies and individuals. | 4.10.1 | The certification body shall have adequate arrangements consistent with applicable laws to safeguard confidentiality of the information obtained in the course of its certification activities at all levels of its organization, including committees and external bodies or individuals acting on its behalf. |
| Comparison: IDEM | | | Comment: The ISO65 reference to legal requirements is covered in IAC 4.1.3 | | |
| | 4.1.2 Confidentiality policy contents | 4.1.2. | This shall include the establishment of a confidentiality policy and the requirement for all personnel to sign a confidentiality agreement. This policy shall specify the type of information that is not covered by confidentiality, such as name and address, and third parties that may have access to the information such as accreditation bodies. | 5.2.2 | The certification body shall require its personnel involved in the certification process to sign a contract or other document by which they commit themselves a) to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interest; |
| Comparison: IAC additional requirement | | | Comment: The IAC requires that the certification body defines the nature of information that is not covered by confidentiality. For conflict of itnerest issues see | | |
| | 4.1.3 Consent to disclose | 4.1.3. | Except as required in these criteria or by law, or otherwise permitted in the certifiers published rules, information gained in the | 4.10.2 | Except as required in this Guide or by law, information gained in the course of certification activities about a particular |

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| | | <p>course of certification activities about a particular product or supplier shall not be disclosed to a third-party without the written consent of the supplier. Where the law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided as permitted by the law.</p> | <p>product or supplier shall not be disclosed to a third-party without the written consent of the supplier. Where the law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided as permitted by the law.</p> |
| <p>Comparison: ISO65 additional requirement.</p> | | <p>Comment: ISO65 restricts information that may be disclosed to those defined in accreditation criteria or by law, while the IAC allows for additional disclosures providing these are published in its rules. The difference is eliminated if the certification body requires the applicant to agree to all its rules as this would constitute written consent</p> | |

5. DOCUMENTATION AND DOCUMENT CONTROL

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---------------------------------------|---------|--|---------|---|
| 5.1 general | | | | | |
| | 5.1.1 Overall requirement | 5.1.1. | The certification body shall document its certification system, make appropriate documents available to the public on request and demonstrate control over all documents issued | 4.5.3 | The quality system shall be documented in a comprehensive Quality Manual and associated quality procedures |
| Comparison: IDEM | | | Comment: See also ISO65 4.8.1 and 4.8.2 | | |
| 5.2 public access to information | | | | | |
| | 5.2.1 Publicly available documents | 5.2.1 | The certification body shall make publicly available, through print and or electronic media, up to date information on the following: a. information, where relevant, describing the authority under which the certification body provides its certification service ; b. the rules and procedures, or a description of the procedures for evaluation of the inspection report and approval, continuation or extension of certification; c. the rules and procedures suspension and withdrawal of certification d. the standards; e. a description of the certification body's sources of income and clear indications of | 4.8.1 | The certification body shall provide (through publications, electronic media or other means), update at regular intervals, and make available on request, the following- a) information about the authority under which the Certification body operates; b) a documented statement of its product certification system, including its rules and procedures for granting, maintaining, extending, suspending and withdrawing certification; c) information about the evaluation procedures and certification process related to each product certification system; d) a description of the means by which the organization obtains financial support |

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| | | | <p>the fees charged to applicants and current licensed operators;</p> <p>f. a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted;</p> <p>g. procedures for handling complaints and appeals;</p> <p>h. a current list of certified operators, including name and location and the scope of the certification;</p> <p>i. a listing of contracted production shall also be available although this may be a general list without linkage to the certified operator.</p> | | <p>and general information on the fees charged to applicants and to suppliers of certified products;</p> <p>e) a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted.</p> <p>f) information about procedures for handling complaints, appeals and disputes;</p> <p>g) a directory of certified products and their suppliers.</p> |
| Comparison: IDEM | | | Comment: Differences between the two lists are not of substance. IAC refers to contract production a situation commonly found in agricultural certification. | | |
| 5.3 document control | | | | | |
| | 5.3.1 Document control system | 5.3.1. | <p>The certification body shall maintain a documented system for the control of all documentation relating to the certification system and shall ensure that:</p> <p>a. the current issues of the appropriate documentation are available at relevant locations;</p> <p>b. all changes of documents are covered by the correct authorization;</p> <p>c. all changes are processed in a manner which will ensure direct and speedy action;</p> <p>d. superseded documents are removed from use throughout the organization and its agencies;</p> | 4.8.2 | <p>The certification body shall establish and maintain procedures to control all documents and data that relate to its certification functions.</p> <p>These documents shall be reviewed and approved for adequacy by appropriately authorized and competent personnel prior to issuing any documents following initial development or any subsequent amendment or change being made</p> <p>The distribution of all such documents shall be controlled to ensure that the appropriate documentation is made</p> |

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| | | | <p>e. all affected parties are notified of changes;</p> <p>f. there is a register of all appropriate documents with the respective issue identified;</p> <p>g. there is a determination of which documents are available to the public and which are not;</p> <p>h. documentation clearly indicates its date of implementation.</p> | | <p>available to personnel of the certification body or suppliers when they are required to perform any function relating to the certification body's activities.</p> <p>A listing of all appropriate documents with the respective issue and/or amendment status identified shall be maintained</p> |
| Comparison: IAC additional requirement | | | Comment: The lists are substantially the same with the exceptions that the IAC requires the document to indicate its date of implementation and that the certification body must determine which documents are publicly available and which not. | | |
| 5.4 records | | | | | |
| | 5.4.1 Records management and disposal | 5.4.1. | The certification body shall maintain a records system and have policies and procedures governing their management. The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information | 4.9.1 | <p>The certification body shall maintain a record system to suit its particular circumstances and to comply with existing regulations..</p> <p>The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information.</p> |
| Comparison: IDEM | | | Comment: | | |
| | 5.4.2 Annual report | 5.4.2. | The certification body shall produce and make publicly available an annual report summarizing the certification activities of the previous year including elements such as the extent of the certification activities. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

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| | 5.4.3 Operator file content | 5.4.3. & 5.4.4 | Operator files shall be up to date and contain all relevant information, including history, and product specifications. The certification body shall have available relevant data for all certified production units, including any contracted parties and members of grower groups. The records shall demonstrate the way in which each certification procedure was applied, including inspection reports and outcome of imposed sanctions. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 5.4.4 Separate records | 5.4.5. | Separate records shall be kept for major violations and resulting sanctions, precedents, exceptions, appeals, and complaints, in a way that enables easy retrieval of data. | | |
| Comparison: Not addressed by ISO 65 | | | Comment | | |
| | 5.4.5 Record storage | 5.4.6. | All records shall be safely stored and held secure and in confidence to the operator, for a period not less than five years or for the period stipulated in relevant governmental and regional regulations where this exceeds five years. | 4.9.1 4.9.2 | The records shall be kept for a period of time so that continued confidence may be demonstrated for at least one full certification cycle, or as required by law. The certification body shall have a policy and procedures for retaining records for a period consistent with its contractual, legal or other obligations |
| Comparison: IAC additional requirement | | | Comment: The IAC stipulates a minimum period which ISO 65 does not | | |

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| | 5.4.6 Signatures in records | 5.4.7. | Inspection reports, certification decisions, certificates and other relevant records shall be signed by the authorized person. | | |
| Comparison: Not addressed by ISO 65 | | | Comment | | |
| | 5.4.7 Records access | 5.4.8. | The certification body shall have a policy and procedures concerning access to these records consistent with its confidentiality requirements. | 4.9.2 | The certification body shall have a policy and procedures concerning access to these records consistent with 4.10.1. |
| Comparison: IDENTICAL | | | Comment | | |
| | 5.4.8 Records retrieval | 5.4.9. | The record keeping system shall be transparent and enable easy retrieval of information | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 5.4.9 Operator access to records | 5.4.10. | Operators shall have the right to have copies of inspection findings and other documentation related to the certification of their production, unless the documents are confidential (i.e. filed complaints, confidential section of inspection reports). * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

6. APPLICATION AND INSPECTION PROCEDURES

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------------|--|--------------------|---|
| 6.1 application procedures | | | | | |
| | 6.1.1 Information to applicants | 6.1.1. | The certification body shall ensure that each applicant or re-applicant has at the time of application: a. a current version of the applicable standards; b. an adequate description of the inspection, certification and appeals procedures; c. a sample copy of the contract or license agreement; d. a copy of the fee schedule ; | 8.1.1 4.3 | The certification body shall provide to applicants an up-to-date detailed description of the evaluation and certification procedures, appropriate to each certification scheme, and the documents containing the requirements for certification, the applicants' rights and duties of suppliers which have certified products (including fees to be paid by applicants and suppliers of certified products). The certification body shall specify the relevant standards or parts thereof and any other requirements such as sampling, testing and inspection requirements which form the basis for the applicable certification system. |
| Comparison: ISO 65 additional requirement | | | Comment: The ISO 65 requirement is more comprehensive. The IAC list may or may not include all the requirements for certification depending on the contents of the contract | | |
| | 6.1.2 Additional explanation to applicants | | | 8.1.3 8.1.4 | When the desired scope of certification is related to a specific system or type of system operated by the certification body, any explanation needed shall be provided to the applicant. |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|------------------------|---------------|---|---------|--|
| | | | | 9.1b | If requested, additional application information shall be provided to the applicant Before proceeding with the evaluation, the certification body shall conduct, and maintain records of, a review of the application for certification to ensure that b) any difference in understanding between the certification body and the applicant is resolved |
| Comparison: Not addressed by IAC | | | | | |
| | 6.1.3 application form | 6.1.2. | The certification body shall require completion of an official application form, signed by the applicant or a duly authorized representative of the applicant. This shall determine at least the following information: a. the scope of the desired certification including the production and area to be certified, and in cases where the certification body offers more than one certification program, the standards against which the product is to be certified. b. Sufficient information about the production system to enable appropriate assignment of the inspector and proper preparation by the inspector c. A statement as to whether they have been denied certification by another certification body and the requirement to | 8.2.1 | The certification body shall require completion of an official application form, signed by a duly authorized representative of the applicant, in which or attached to which are the following: a) the scope of the desired certification.- . |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | submit information regarding actions taken to correct the deficiencies leading to the denial. | | |
| Comparison: IAC additional requirement | | | Comment: The IAC requires information about the production system and the statement regarding previous certification | | |
| | 6.1.4 Written agreement with operator | 6.1.3. | The certification system shall be based on written agreements and clear responsibilities with all parties involved in the chain of production of a certified product. | 4.2.g | (The certification body shall) have rights and responsibilities relevant to its certification activities |
| Comparison: IDEM | | | Comment: | | |
| | 6.1.5 operator obligations | 6.1.4. | The certification body shall require the operator to sign statements in the application form or elsewhere, obliging them to: a. agree to comply with the requirements for certification including a commitment to comply with the standards, and to supply any information needed for evaluation of the production to be certified; b. provide the right of access to all appropriate facilities including any non-organic production in the unit, or related (by ownership or management) units in the proximity to both certification and accreditation personnel ; c. provide access to all relevant documentation including financial records to both certification and accreditation personnel. | 8.1.2 8. 2. 1 b | The certification body shall require that a supplier a) always complies with the relevant provisions of the certification programme: b) makes all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints; b) a statement that the applicant agrees to comply with the requirements for certification and to |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | | | supply any information needed for evaluation of products to be certified. |
| Comparison: Additional requirement of IAC | | | Comment: IAC refers to access to non-organic areas (sector specific requirement). IAC also refers to rights of access to documentation at operator level. 8.2.1b of ISO 65 is more specific in requiring access to records of complaints but this may be considered to be covered by the IAC reference to all “relevant” documentation. | | |
| | 6.1.6 operator documentation | 6.1.5 | The certification body shall specify, in application documentation or elsewhere, the documentation to be maintained by the operator to enable verification of compliance. This shall specify which records shall be available and require that they be held in a form that enables verification to take place. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: In product certification specific operator documentation may need to be required by the certification body in order to enable verification to take place. | | |
| | 6.1.7 Operator documented procedures | 6.1.6 | The certification body shall require documented procedures defining the manner of production or processing where the absence of such procedures could adversely affect the organic quality. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.1.8 Retention of documents by operator | 6.1.7. | Documents required by 6.1.5 and 6.1.6 shall be kept for a minimum of five years. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------------|--|---------|---|
| 6.2 preparation for inspection | | | | | |
| | 6.2.1 Review of application | 6.2.1. | Before proceeding with the evaluation, the certification body shall conduct a review of the application for certification to ensure that the requirements for certification are clearly understood. | 9.1.a | Before proceeding with the evaluation, the certification body shall conduct, and maintain records of, a review of the application for certification to ensure that a) the requirements for certification are clearly defined, documented and understood; |
| Comparison: ISO65 additional requirement | | | Comment: IAC does not require the certification body to maintain records of the review | | |
| | 6.2.2 Evaluation plan | | | 9.2 | The certification body shall prepare a plan for its evaluation activities to allow for the necessary arrangements to be managed. |
| Comparison: Not addressed by IAC | | | | | |
| | 6.2.3 Assessment of CB ability re application | 6.2.2. | In some circumstances (operation of multiple certification programs, international operations located in regions not usually covered by the certifier), the certification body shall assess whether it has the capability to perform the certification service with respect to the scope of the certification sought and, if applicable, the location of the applicant's operations and any special requirements such as the language used by the applicant. | 9.1 c | c) the certification body has the capability to perform the certification service with respect to the scope of the certification sought and, if applicable, the location of the applicant's operations and any special requirements such as the language used by the applicant. |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| Comparison: IDEM | | | Comment: In most cases in organic certification the ability of the certification body to carry out the function is not in doubt. | | |
| | 6.2.4 information to inspector | 6.2.3. | The certification body shall provide the inspector with sufficient information to properly prepare for the inspection. This includes at least the application form, previous inspection findings, a description of activities/processes, maps/plans, product specifications, and used inputs, previous conditions and sanctions. | 9.4 | To ensure that a comprehensive and correct evaluation is carried out, the personnel involved shall be provided with the appropriate working documents. |
| Comparison: IAC additional requirement | | | Comment: IAC is more specific regarding the documentation. To some extent this is a sector specific requirement | | |
| | 6.2.5 Assignment qualifications | 6.2.4. | The certification body, or the sub-contracted inspection body shall assign personnel appropriately qualified to perform the tasks for the specific inspection. Operators shall have neither the right to choose nor to recommend inspectors. | 9.3 | The certification body shall assign personnel appropriately qualified to perform the tasks for the specific evaluation |
| Comparison: IAC additional requirement | | | Comment: The IAC statement that operators may not choose or recommend inspectors is not reflected in ISO 65. It may be inferred that the requirement that the CB makes the assignment means that operators may not choose. However it does not infer operators may not make recommendations | | |
| | 6.2.6 Assignment- Conflict of interest | 6.2.5. 1.3.20 | The assignment of the inspector shall take into account any possible conflict of interest in line with criterion 1.3.19. The certification body shall require persons engaged in inspection or certification to agree in writing to abstain from participating in work for operators with whom they have personal relations or to | 9.3 | Personnel shall not be assigned if they have been involved in, or been employed by a body involved in, the design, supply, installation or maintenance of such products in a manner and within a time period which could conflict with impartiality. |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | those with whom they have had business relationships (either trade or advisory) in the past two years | | |
| Comparison: IAC additional requirement | | | IAC refers to two years. ISO 65 is less specific | | |
| | 6.2.7 Assignment rotation | 6.2.6. | The assignment of the inspector shall ensure that the same inspector shall as a rule not be assigned to an operator for more than 3 consecutive years and under no circumstances for more than 4 years. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 6.2.8 Assignment Operator objection | 6.2.7. | Operators shall have the right to be informed about the identity of the inspector before the inspection visit, and to raise objections related to any potential conflict of interest. This shall not apply to unannounced inspections. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 6.3 visit procedures | | | | | |
| | 6.3.1 Scope of inspection | 6.3.1. | The management systems of the applicant shall be evaluated against the specified standards and certification requirements. | 10 | The certification body shall evaluate the products of the applicant against the standards covered by the scope defined in its application against all certification criteria specified in the rules of the scheme. |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | | | |
| Comparison: IDEM | | | Comment: The difference regarding management systems as opposed to products is a sector specific issue | | |
| | 6.3.2 Inspection protocol | 6.3.2. | Inspection procedure shall follow a decided protocol to facilitate a nondiscriminatory and objective inspection procedure. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: ISO 10011-1 contains audit procedures. This is not referenced in ISO65 | | |
| | 6.3.3 Inspection procedures-required assessments | 6.3.3. | The inspection procedure shall be documented and shall at least include: * a. assessment of production or processing system of operator by means of visits to facilities, fields, and storage units; b. identification and investigation of areas of risk; c. review of records and accounts; d. production/sales reconciliation on farms; and input/output reconciliation, and traceback audits in processing and handling; e. interviews with responsible persons including an exit interview; f. verification that changes that have taken place in the standards and rules of the certification body have been effectively implemented by the operator; g. residue sampling in accordance with the certification body's sampling policy; h. verification that previously imposed conditions have been fulfilled. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------------|--|--|--|
| | | | | | any other requirements such as sampling, testing and inspection requirements |
| Comparison: IAC additional requirement | | | Comment: The ISO 65 stipulation does not include the provisions mandated by the IAC. The ISO 65 listing would appear to be more appropriate for product certification than for certification of a production system. Soem of the IAC requiriements are sector specific | | |
| | 6.4.2 Analyses | 6.4.2. | Analyses shall be done by competent laboratories (accredited laboratories, where official accreditation exists). | 4.3 4.4.b | In conducting its certification operations, the certification body shall observe, as appropriate, the requirements for the suitability and competence of body(ies) or person(s) carrying out testing, inspection and certification/registration as specified in ISO/IEC Guides 25, 39 and 62. ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing |
| Comparison: IDEM | | | Comment: | | |
| | 6.4.3 Documented testing & analysis procedures | 6.4.3. | If laboratory procedures are employed, the certification body shall document the following: a. the sampling protocol; b. the testing procedures; c. acceptable labs used to conduct such analysis. | 4.3 | The certification body shall specify the relevant standards or parts thereof and any other requirements such as sampling, testing and inspection requirements |
| Comparison: IAC additional requirement | | | The IAC includes the requirement to document acceptable laboratories. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| 6.5 inspection report | | | | | |
| | 6.5.1 General scope of report | 6.5.1. | Inspection reports shall cover relevant aspects of the production standards, adequately validate the information provided by the operator and indicate any non-conformities. | 4.3 | The certification body shall take all steps necessary to evaluate conformance with the relevant product standards according to the requirements of specific product certification system |
| Comparison: IDEM | | | | | |
| | 6.5.2 Report - quality of information | 6.5.2. | Inspection reports and written documentation shall provide sufficiently comprehensive information for the certification body to make competent and objective decisions | 11a | personnel appointed to evaluate the conformance of the products shall provide the certification body with a report of findings as to the conformity with all the certification requirements.' |
| Comparison: IAC additional requirement | | | Comment: The requirement sof the two norms appear similar. However while the ISO65 requirement refers to the breadth of information provided (covered by the IAC in 6.5.1 above) the IAC requirement relates to the depth of the information. This is only appropriate for certification of a production system where not all standards can be verified by measurement as they can in a product certification. Sector sepcific requirement. | | |
| | 6.5.3 Report format | 6.5.3. | Inspection reports shall follow a decided format to facilitate a non-discriminatory, objective and comprehensive analysis of the production system | | |
| Comparison: IAC additional requirement | | | Comment: ISO 10011-1 contains a list of contents that should be included in reports. This is not referenced in ISO65 | | |
| | 6.5.4 Report - Inspector analysis. | 6.5.4. | Reports shall be designed to allow for elaboration and analysis by the inspector in cases of partial compliance or lack of clarity in the standards. | | |
| Comparison: | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------------|---|---------|---|
| | 6.5.5 Report - inspector recommendation s | 6.5.5. | The report shall contain an assessment of risk as well as the inspectors' observations regarding conformity with standards. Inspectors shall be able to make recommendations regarding nonconformities but shall not be required to make an overall judgment of whether the operator should be certified. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: The two issues not covered in ISO 65 are those of risk assessment and the prohibition on requiring an overall judgment from the inspector | | |
| | 6.5.6 Report - follow-up | 7.2.6 | The certification body shall have the right to impose conditions. Mechanisms for monitoring compliance with conditions and restrictions shall be in place. | 11.b | a full report on the outcome of the evaluation is promptly brought to the applicant's notice by the certification body, identifying any nonconformities that have to be discharged in order to comply with all of the certification requirements and the extent of further evaluation or testing required. If the applicant can show that remedial action has been taken to meet all the requirements within a specified time limit, the certification body shall repeat only the necessary parts of the initial procedure. |
| Comparison: ISO 65 additional requirement | | | Comment: The IAC contains no reference to bringing the report to the applicant's notice. The IAC requirement regarding monitoring of conditions (nonconformities) does not refer to follow-up inspections but requires only that the certification body has mechanisms in place. The IAC also does not refer to time limits | | |
| 6.6 record of inspection | | | | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------------|--|---------|--|
| | 6.6.1 Record of inspection protocol | 6.6.1. | The certification body shall require inspectors to record what occurred during the inspection visit. This shall at least include: a. date and duration of inspection; b. persons interviewed; c. fields and facilities visited; d. Type of document audits conducted (input/output; yield/sales; traceback etc). | 13.3 | The certification body shall document its surveillance activities. |
| Comparison: IAC additional requirement | | | Comment: The IAC is more specific in its required records. | | |
| 6.7 Additional requirements and inspection regime for particular standards | | | | | |
| | 6.7.1 conversion period verification | 6.7.1. | The certification body shall verify full application of the standards for a period no less than that stated in the IFOAM Basic standards, prior to certification. Full application shall as a rule require active management. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.2 Start of conversion | 6.7.2. | Verification of full application of standards shall normally require that at least the minimum period stated in the IFOAM Basic standards shall take place following the application for | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------------|---|---------|----------|
| | | | certification. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.3 Conversion inspection | 6.7.3. | Inspection shall occur during the conversion period to verify compliance with standards. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.4 Retroactive conversion | 6.7.4. | Exceptions to 6.7.2 above shall be on the basis of indisputable documented evidence that full application of the standards has occurred. This shall be verified by inspection. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.5 Split production special regimes | 6.7.5. | The certification program shall have additional requirements and inspection regimes when split production occurs to safeguard that the products are not be mixed or contaminated. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.6 Split production - required verification | 6.7.6. | The certification body shall require and verify by inspection: a. that prohibited materials are stored in separate locations from those where organic products are handled; | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|---------------|--|---------|----------|
| | | | <p>b. that the documentation regarding the production or processing and sales is well managed and makes clear distinctions between certified and not certified products;</p> <p>c. that the measures taken to safeguard against the risk to the organic integrity is understood at all levels of the operation.</p> | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.7 parallel production-visual distinction | 6.7.7. | <p>If a farm is engaged in parallel production, the certification body shall require that in addition to the requirements for split production above:</p> <p>a. non organic (or conversion) crops, livestock and produce and organic crops, livestock and produce are of different varieties and are visually distinguishable. Exceptions shall only be granted on a case by case basis in accordance with the requirements in 6.7.8.</p> <p>b. accurate production estimates are recorded and shall be checked against sales records;</p> <p>c. the inspection includes visits to the non-organic fields and/or processing units.</p> | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.8 | 6.7.8. | In cases where an exception has been | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|----------------|--|---------|----------|
| | Parallel production-exception requirements | | granted to the requirements for producers in 6.7.7.a.: * a. Inspections shall occur at critical times. This shall normally include inspections at the time of harvest or during processing. b. Inspections shall occur more frequently than once a year whether scheduled or unannounced | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.9 GEO inspection system | 6.7.9. | The certification body shall implement a system to inspect and verify that genetically engineered organisms and their products or derivatives are not used in certified organic production and or/processing as required by the IFOAM Basic Standards. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.10 GEO risk information to operators | 6.7.10. | The certification body shall make available to operators information regarding those products, varieties, species and ingredients known by the certification body to be at risk of being genetically engineered. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.11 GEO verification measures | 6.7.11. | For each of these risk areas, the certification body shall adopt one or more of the following measures: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|----------------|---|---------|----------|
| | | | a. review of signed statements verifying that the product is not genetically engineered; b. and/or testing to defined limits; c. and/or inspection of suppliers. d. and/or other measure(s) determined by the certifier to be appropriate and as defined in the certifier's policies and procedures, consistent with this criterion. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 6.7.12 GEO required risk reduction measures | 6.7.12. | Where the certification body identifies substantial risk of contamination with genetically modified organisms, they shall require measures to minimize it. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |

7. CERTIFICATION PROCEDURES

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---------------------------------|--|----------------------|--|----------------------|---|
| 7.1 general requirements | | | | | |
| | 7.1.1 General procedural requirement | 7.1.1. 7.1.2a | The certification body shall specify conditions under which it grants and the procedures for granting certification The certification body shall have procedures to a. grant, maintain, withdraw and, if applicable, suspend certification | 4.6.1 4.6.2.a | The certification body shall specify the conditions for granting, maintaining and extending certification and the conditions under which certification may be suspended or withdrawn, partially or in total The certification body shall have procedures to a. grant, maintain, withdraw and, if applicable, suspend certification |
| Comparison: IDEM | | | Comment: | | |
| | 7.1.2 Procedures for changes in scope changes in scope | 7.1.2. | , b. extend or reduce the scope of certification, c. re-evaluate, in the event of changes significantly affecting the product's specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system. | | b. extend or reduce the scope of certification, c. re-evaluate, in the event of changes significantly affecting the product's specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system |
| Comparison: IDENTICAL | | | Comment: | | |
| | 7.1.3 | 7.1.3. | The documented certification policies and | 8.1.1 | The certification body shall provide to |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|------------------------------------|---------|---|----------------|---|
| | Scope of documented procedures | | procedures shall include all procedural steps in processing the application, until final certification. | | applicants an up-to-date detailed description of the evaluation and certification procedures |
| Comparison: IAC additional requirement | | | Comment: The IAC requirement for all procedures to be documented is not reflected in any of the ISO 65 requirements | | |
| | 7.1.4 Implementation of procedures | 7.1.4. | The certification body shall execute its certification activities in compliance with all its stated procedures and standards. | 4.5.2 | The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. |
| Comparison: IDEM | | | Comment: | | |
| 7.2 Certification decisions | | | | | |
| | 7.2.1 transparency of decisions | 7.2.1. | All certification decisions, including those concerning the maintenance of certification, shall be objective and transparent and be recorded in such a way as to enable the decision to be traced back. | 4.1.4 4.9.1 | The certification body shall confine its requirements, evaluation and decision on certification to those matters specifically related to the scope of the certification being considered The records shall demonstrate that the certification procedures have been effectively fulfilled, particularly with respect to application forms, evaluation reports, surveillance activities and other documents relating to granting certification |
| Comparison: IDEM | | | | | |
| | 7.2.2 | 7.2.2. | Compliance with standards shall result in the issue of a certification document which | 12.3 | The certification body shall provide to each supplier offering certified products, formal certification documents such as a |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|---------|--|---------|--|
| | Issuing of certification document | | provides full information on the nature and validity of the certification. | | letter or a certificate signed by an officer who has been assigned such responsibility. |
| Comparison: IDEM | | | Comment: | | |
| | 7.2.3 Recording and communication of decision | 7.2.3. | Certification decisions, including the scope, shall be recorded and clearly communicated to the operator. | 12.3 | The certification body shall provide to each supplier offering certified products, formal certification documents such as a letter or a certificate signed by an officer who has been assigned such responsibility. These formal certification documents shall permit identification of the following: b) the scope of the certification offered |
| Comparison: IDEM | | | Comment: | | |
| | 7.2.4 certification denial | 7.2.4. | When certification is denied, the reasons shall be clearly stated. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.2.5 Exceptions | 7.2.5. | If exceptions are granted there shall be criteria and procedures for granting exceptions. Exceptions shall be clearly limited in time and the rationale for any exception shall be properly recorded (see also 5.4.5). | | a full report on the outcome of the evaluation Identifying any nonconformities that have to be discharged in order to comply with all of the certification requirements |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|---------|---|---------|---|
| | 7.2.6 Conditions and condition monitoring | 7.2.6. | The certification body shall have the right to impose conditions. Mechanisms for monitoring compliance with conditions and restrictions shall be in place. | 11.b | a full report on the outcome of the evaluation Identifying any nonconformities that have to be discharged in order to comply with all of the certification requirements and the extent of further evaluation or testing required. |
| Comparison: IDEM | | | Comment: Additional requirements of ISO65 are dealt with in subcategory 6.5.6 | | |
| | 7.2.7 Conditions re restricted materials | 7.2.7. | In cases where the certification body has permitted an operator frequent recourse to substance or practices that are restricted in standards, conditions to minimize such usage shall be imposed. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Sector specific requirement related to organic standards use of the category of restricted inputs. | | |
| | | 7.2.8. | When a subjective judgment is required to determine compliance these shall be based on criteria and procedures. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: Note this is covered by the IAF guidance G4.4 on ISO65 | | |
| 7.3 the certification process | | | | | |
| | 7.3.1 Certification procedural requirements | 7.3.1. | The procedures shall ensure: a. that the certification status of all operators and their production and, where relevant, the scope of existing certification, be indicated throughout the certification process; | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|-------------------------------|---------|---|---------|---|
| | | | <p>b. that processing of inspection reports and certification decisions shall be done in a timely manner;</p> <p>c. that processing of any issue related to violations of standards shall be done with highest priority.</p> | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 7.4 certificates | | | | | |
| | 7.4.1 certificates conformity | 7.4.1. | <p>The certification body shall issue certificates confirming conformity of a certified operation. These shall include at least:</p> <p>a. the name and address of the operator;</p> <p>b. the name and address of the certification body;</p> <p>c. the program under which the operator is certified;</p> <p>d. the scope of the certification including reference to the applicable standards, the products or product categories, and the certification status (conversion or organic) of each.</p> <p>e. the date of issuance;</p> <p>f. the period of validity.</p> | 12.3 | <p>The certification body shall provide to each supplier offering certified products, formal certification documents such as a letter or a certificate signed by an officer who has been assigned such responsibility. These formal certification documents shall permit identification of the following:</p> <p>a) the name and address of the supplier whose products ' are the subject of certification;</p> <p>b) the scope of the certification granted, including, as appropriate,</p> <p>1) the products certified, which may be identified by type or range of products,</p> <p>2) the product standards or other normative documents to which each product or product type is certified,</p> |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--------------------------|-----------------------------------|---------|---|---------|--|
| | | | | | <p>3) the applicable certification system;</p> <p>c) the effective date of certification, and the term of the certification if applicable.</p> |
| Comparison : IDEM | | | Comment: | | |
| | 7.4.2 Transaction certificates | 7.4.2. | <p>Where the certification body issues transaction certificates itself (self-declarations), or provides forms for operators to issue self declared certificates, the certification body shall ensure that certificates contain sufficient information to prevent fraudulent usage. This shall at least include:</p> <p>a. the seller;</p> <p>b. the buyer;</p> <p>c. the date of delivery and/ or date of transaction;</p> <p>d. the date of issuing the certificate;</p> <p>e. a clear indication of the product and the quantity and its certification status;</p> <p>f. lot numbers and other identification (marks) of the products;</p> <p>g. reference to an invoice or bill of lading if present at the time of certificate issuance;</p> <p>h. an indication of the certification body and the applicable standard;</p> <p>i. a statement from the operator that the product is produced according to the applicable standards.</p> | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | Where for logistic or other reason this is not possible at the time of issuance of the certificate, this shall be obtained and integrated into the certification body documentation within six weeks. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.4.3 Transaction certificate checks | 7.4.3. | The certification body shall take reasonable measures to verify that the information provided is correct, including verifying accumulative totals of certificates issued against production estimates. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.4.4 Transaction certificate records | 7.4.4. | In the case of operator self declarations the certification body shall require that copies of issued transaction certificates be retained by the operator for 5 years and be available to the CB if required. Such transaction certificates shall be audited at the annual inspection. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.4.5 transaction certificate storage | 7.4.5. | Copies of all issued transaction certificates shall be stored in a manner that enables easy retrieval and audit of information on each operator. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|--|------------------|---|
| 7.5 surveillance inspections | | | | | |
| | 7.5.1 frequency of scheduled inspections | 7.5.1. | The certification body shall have a written policy on inspection frequency which shall require that: inspection of certified operators and of subcontracted operators occurs at least annually. | 13.1 13.4 | The certification body shall have documented procedures to enable surveillance to be carried out in accordance with the criteria applicable to the relevant certification system Where the certification body authorizes the continuing use of its mark on products of a type which have been evaluated, the certification body shall periodically evaluate the marked products to confirm that they continue to conform to the standards. |
| Comparison: IAC Additional requirement | | | Comment: ISO 65 refers to periodic evaluation. IAC requires this to be no less than annual | | |
| | 7.5.2 Frequency criteria | 7.5.2. | There shall be provisions for additional scheduled inspections. The criteria or circumstances when more than one inspection will be scheduled per year shall be documented and shall be based on risk analysis taking into account factors such as the type of production; the operators record of compliance; and complexity of production. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--------------------------------|---------|---|---------|----------|
| | 7.5.3 Inspection timing | 7.5.3. | Timing of inspections shall not be so regular as to become predictable. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.5.4 unannounced visits | 7.5.4. | The certification body shall have a documented policy requiring unannounced visits that includes the minimum number (percentage) to be carried out annually. This is in addition to the scheduled inspections referred to in 7.5.1. and 7.5.2. above. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.5.5 Unannounced access | 7.5.5. | Certification bodies shall secure the rights to conduct such unannounced visits. * | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.5.6 Unannounced nature | 7.5.6. | Unannounced inspections shall be without forewarning. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.5.7 Unannounced selection | 7.5.7. | The basis for selection of operators to be subject to such inspections shall be defined | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---------------------------------------|---------|--|---------|--|
| | | | and include both random and targeted selection. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.5.8 Unannounced records | 7.5.8. | A record of unannounced visits shall be maintained. | 13.3 | The certification body shall document its surveillance activities. |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 7.6 Surveillance -monitoring changes | | | | | |
| | 7.6.1 Updating procedures | 7.5.9. | The certification body shall have procedures for extension and updating certification. | 4.6.1 | The certification body shall specify the conditions for granting, maintaining and extending certification |
| Comparison: IDEM | | | Comment: | | |
| | 7.6.2 Obligation to notify changes | 7.5.10. | The certification body shall require operators to sign contracts, agreements or affidavits obliging them to notify the certification body of any changes such as modification to the products, the manufacturing process, extension of acreage, management or ownership. | 13.2 | The certification body shall require the supplier to inform it about any of the changes cited in 4.6.2 c), such as intended modification to the product, manufacturing process or, if relevant, its quality system, which affect the conformity of the product |
| Comparison: IDEM | | | Comment: | | |
| | 7.6.3 Assessment of changes | 7.5.11. | The certification body shall have procedures for assessing the announced changes as well as procedures for re- | 13.2 | The certification body shall determine whether the announced changes require further investigations. If such is the case, |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|----------------------------|---------|--|------------------|---|
| | | | inspection when necessary. The operator shall not be allowed to release certified products resulting from such changes until the certification body has notified the operator accordingly. | 12.4 | <p>the supplier shall not be allowed to release certified products resulting from such changes until the certification body has notified the supplier accordingly.</p> <p>In response to an application for amendment to the scope of a certificate already granted, the certification body shall decide what, if any, evaluation procedure is appropriate in order to determine whether or not the amendment should be made and shall act accordingly.</p> |
| Comparison: IDEM | | | Comment: The IAC requirement for assessment refers only to notified changes. However 7.5.9 of the IAC requires that the certification body have procedures to deal with requests for extension of scope and the examples given in 7.5.10 indicate that extensions of scope are included in “announced changes” | | |
| 7.7 Use of licenses, certificates and marks of conformity | | | | | |
| | 7.7.1 System of control | 7.6.1. | The certification body shall exercise control over the use of its licenses, certificates and marks of conformity (logo, seal), including a requirement for pre-approval of labels. | 14.1 14.2 | <p>The certification body shall exercise proper control over ownership, use and display of licences, certificates and marks of conformity.</p> <p>Guidance on the use of certificates and marks permitted by the certification body may be obtained from ISO/IEC Guide 23.</p> |
| Comparison: IAC additional requirement | | | Comment: The IAC requires pre-approval of labels. The ISO 65 reference to ISO/IEC Guide 23 is not considered an additional requirement as it is referred to only for guidance | | |
| | 7.7.2 | 7.6.2. | The certification body shall have | 14.1 | The certification body shall exercise |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--------------------------|---------------------------------------|---------|---|---|---|
| | Ownership of mark | | documents which demonstrate its ownership or control of the certification mark, when such a mark exists. | | proper control over ownership ofmarks of conformity. |
| Comparison: IDEM | | | Comment: | | |
| | 7.7.3 Rules on use of mark | 7.6.3. | The certification body shall establish rules concerning the use of its mark or other reference to the certification. These criteria shall require that the operator only makes claims regarding certification which are consistent with the scope of the certification that has been granted. | 8.1.2d 8.1.2 c 8.1.2f 8.1.2h | The certification body shall require that a supplier.....does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification which the certification body' may consider misleading or unauthorized; makes claims regarding certification only in respect of the scope for which certification has been granted f) uses certification only to indicate that products are certified as being in conformity with specified standards; in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of the certification body. |
| Comparison : IDEM | | | Comment: 8.1.2d is covered in IAC 7.6.5. ISO 8.1.2c and 8.1.2f refer to scope which is the subject of the iAC requirement. ISO65 clause 8.1.2h is reflected in the IAC by use of the term “or other references to certification”. | | |
| | 7.7.4 Investigating fraudulent use | 7.6.4. | Certification bodies shall actively investigate fraudulent situations of which they gain knowledge. | 14.1 | The certification body shall exercise proper control over ownership, use and |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|-----------------------------------|---|---------|---|----------------------------------|--|
| | | | | | display of licences, certificates and marks of conformity. |
| Comparison: IDEM | | | Comment: Although the IAC is more specific in requiring active investigation this may be considered to be covered by the ISO65 requirement for “proper control”. | | |
| | 7.7.5 Abuse- remedial actions | 7.6.5. | Incorrect references to the certification system or misleading use of licenses, certificates or marks shall be dealt with by suitable remedial actions. See also IAC 7.6.3 | 8.1.2d 8.1.2g 14.3 | supplier.....does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification which the certification body may consider misleading or unauthorized; endeavours to ensure that no certificate or report nor any part thereof is used in a misleading manner; Incorrect references to the certification system or misleading use of licences, certificates or marks, found in advertisements, catalogues, etc., shall be dealt with by suitable action. |
| Comparison : IDEM | | | Comment: The additional wording in ISO 65 does not add anything of substance. | | |
| | 7.7.6 Procedures for 3rd party abuse | 7.6.6. | The certification body shall have documented detailed procedures for responding to use of its name or mark or certificates by uncertified parties. Such procedures shall include all steps and include the possibility of legal action. | | |
| Comparison: IAC Additional | | | Comment: The IAC requirement is not restricted to abuse by operators which is covered by both the IAC and ISO 65 in subcategory 7.6.5 above. The IAC requirement includes actively pursuing | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|--|---------|--|---------|---|
| requirement | | | 3rd party abuse. This could be considered to be covered by the more general provisions in ISO65 (example “control over use of marks of conformity”) but it is not specifically stated as it is in the IAC. | | |
| | 7.7.7 Withdrawal certificates and marks | 7.6.7. | The certification body shall have documented procedures for withdrawal and cancellation of contracts, certificates and certification marks. These procedures shall require the operator to discontinue use of certification and certification marks. | 8.1.2e | upon suspension or cancellation of certification, discontinues its use of all advertising matter that contains any reference thereto and returns any certification documents as required by the certification body; |
| Comparison : IDEM | | | | | |
| | 7.7.8 Monitoring corrective actions | 7.6.8. | Certification bodies shall ensure that corrective actions related to misuse of licenses, certificates and marks have been effective. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 7.8 sanctions | | | | | |
| | 7.8.1 Range of sanctions | 7.7.1. | The certification body shall have a documented range of sanctions including measures to deal with minor infractions of the standards. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: ISO 65 requires procedures for suspension (if applicable) and withdrawal. The IAC requires a range of sanctions and that these be documented | | |
| | 7.8.2 | 7.7.2. | Documented procedures for imposing such measures shall be in place. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|--|
| | Procedures for imposing sanctions | | | | |
| Comparison: Not addressed by ISO 65 | | | Comment: ISO 65 requires procedures for suspension (if applicable) and withdrawal only. | | |
| | 7.8.3 Withdrawal of product certification | 7.7.3. | Where an infringement, that affects the organic integrity is found, the certification body shall require that the certification mark or any other indication of the certification is removed from the entire production run affected by the infringement concerned. | | The certification body shall specify the conditions..... under which certification may be . withdrawn, partially or in total |
| Comparison: IAC Additional requirement | | | Comment: ISO65 requires the certification body to specify the circumstances. IAC establishes the circumstances. This may be considered a sector specific requirement | | |
| | 7.8.4 Withdrawal of operator certification | 7.7.4. | Where a serious violation is made by the operator, the certification body shall withdraw certification from the operator for a specified period. | 4.6.1 | The certification body shall specify the conditions..... under which certification may be . withdrawn, partially or in total |
| Comparison: IAC Additional requirement | | | Comment: ISO65 requires the certification body to specify the circumstances. IAC establishes the circumstances. This may be considered a sector specific requirement | | |
| | 7.8.5 Emergency withdrawal | 7.7.5. | The certification body shall have procedures for immediate withdrawal of certification in cases where the inspector detects manifest infringements or fraudulent activity. | 4.6.1 | The certification body shall specify the conditions..... under which certification may be . withdrawn, partially or in total |
| Comparison: IAC Additional requirement | | | Comment: The IAC requirement relates to an emergency withdrawal due to potential fraud etc. This is not covered by the general provision of ISO 65 | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------|--|---------|--|
| | 7.8.6 Sanctions records | 7.7.6. | A record of sanctions imposed shall be maintained in line with criterion 4.4.5. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 7.9 appeals | | | | | |
| | 7.9.1 Appeal procedures | 7.8.1. | The certification body shall have procedures for the consideration of appeals against its decisions to grant or remove certification. | 4.2.p | (The certification body shall) have policies and procedures for the resolution of appeals and disputes received from suppliers or other parties about the handling of certification or any other related matters |
| Comparison : IDEM | | | Comment: The differences relate to terminology. In the IAC disputes about "any other related matters" are considered complaints, for which the certification body must have appropriate procedures. See category 3.5 above | | |
| | 7.9.2 Timeliness of appeals & complaints | 7.8.2. | Appeals and complaints shall be dealt with in a timely and efficient manner. | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| | 7.9.3 Appeal resolution | 7.8.3. | When an appeal is decided, a documented resolution shall be made and forwarded to the appellant. | | |
| Comparison: Not addressed by ISO 65 | | | | | |
| | 7.9.4 | 7.8.4. | The certification body shall: | 7.2 | Each certification body shall |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|-----------------------------------|----------------------|--|---------|---|
| | Appeals records and follow-up | | a. keep a record of all appeals (see also 5.4.5.); b. take appropriate subsequent action; c. document the action taken and its effectiveness | | a) keep a record of all appeals, complaints and disputes and remedial actions relative to certification; b) take appropriate subsequent action: c) document the action taken and its effectiveness. |
| Comparison: IDENTICAL | | | Comment: | | |
| 7.10 complaints to operators | | | | | |
| | 7.10.1 Complaints to operators | 7.9.1. 7.9.2. | The certification body shall require that the operator takes appropriate action on complaints related to the compliance with certification requirements. The certification body shall require the operator to keep a record of the above complaints and the corrective action taken (see also 5.4.5). | 15 | The certification body shall require the supplier of certified products to a) keep a record of all complaints made known to the supplier relating to a product's compliance with requirements of the relevant standard and to make these records available to the certification body when requested; b) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification; c) document the actions taken |
| Comparison: ISO 65 additional requirement | | | Comment: The IAC complaints section refers only to certified processors and handlers and does not include farmers. The ISO 65 reference refers to all suppliers. This may be considered a sector specific issue | | |
| 7.11 dual or multiple | | | | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|---|
| certification | | | | | |
| | 7.11.1 Requirements in cases of dual certification | 7.10.1. | In cases of dual or multiple certification with the same certification scope, the certification body shall supply the other certification body (or bodies) with copies of transaction certificates or information regarding sales and inform them in event of decertification. The certification body shall request the same information from the other certification body (or bodies). | | |
| Comparison: Not addressed by ISO 65 | | | Comment: | | |
| 7.12 changes in certification requirements | | | | | |
| | 7.12.1 Notification of changes to operators | 7.11.1. | The certification body shall ensure that each certified operator be notified of changes in the relevant procedures without unnecessary delay. | 6 | The certification body shall give due notice of any changes it intends to make in its requirements for certification |
| Comparison : ISO 65 additional requirement | | | Comment: The IAC requires that they are notified of the changes once they have been decided. The ISO 65 requirement is that notice be given of intended changes. Note that the IAC requirements about changes in standards do require both consultation and notice (see category 10). The difference above relates only to changes other than standards. | | |
| | 7.12.2 Verification of implementation of changes | 7.11.2. | The certification body shall have procedures for the verification of operators' implementation of the required change.s. | 6 | Following decision on, and publication of, the changed requirements, it shall verify that each supplier makes any necessary adjustments within such time as, in the opinion of the certification body, is reasonable. |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|---|---------|--|
| | | | | | |
| Comparison : IDEM | | | Comment: | | |
| | 7.12.3 Operator input re changes | | | 6 | The certification bodyshall take account of views expressed by interested parties before deciding on the precise form and effective date of the changes. |
| Comparison: Not addressed by IAC | | | Comment: The IAC requires this only for standards rather than all certification requirements. | | |

8. INSPECTION AND CERTIFICATION FOR PARTICULAR CIRCUMSTANCES OR SCOPE

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|--|---------|----------|
| 8.1 certification of wild products | | | | | |
| | 8.1.1 Wild product -certification criteria | 8.1.1 | <p>If the certification body includes wild product within their certification scope, they shall have documented requirements and an inspection regime that at least requires that:</p> <ul style="list-style-type: none"> a. the operator managing the harvesting or gathering of the products shall be clearly identified; b. the operator issue instructions to the collectors and any local agents (middlemen), that at least defines the area of collection and informs them about the standards and other requirements for certification; c. the collectors sign statements that they have followed the instructions; d. the operator has records of all collectors, and the quantities bought from each collector; e. any middlemen be under contract to the operator; * f. the area of production be properly identified on appropriate maps, and be large and distinct enough to reduce the risk of commingling with non certified production. | | |
| Comparison : Not addressed by ISO | | | Comment: Sector specific requirement | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------|--|---------|----------|
| 65 | | | | | |
| | 8.1.2 Whild product Comparison to general certification | 8.1.2 | The certification body shall require that the responsible operator be subject to all the normal certification requirements. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.1.3 Wild products inspection regime | 8.1.3. | The inspection regime shall at least include: g. interviews with the collectors, or a representative sample; h. visit to an appropriate proportion of the certified area; i. visits to and interviews of any middlemen; j. gathering of relevant information about the area of collection from interviews of landowners and other parties (environment agencies, NGOs etc.). | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| 8.2 approval or certifation of inputs | | | | | |
| | 8.2.1 Procedures for branded input lists or certification | 8.2.1. | Where a certification body issues lists or in any other way approves brand name products without formal certification it shall document at least the following measures: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---------------------------------------|---------|---|---------|----------|
| | | | <p>a. the application procedure, including the necessary documents to be submitted by the applicant;</p> <p>b. the procedure to be followed in evaluating the products compliance with the certification body's standards;</p> <p>c. the decision making authority;</p> <p>d. the length of time for which approval is granted and the requirements for the manufacturer to report changes in composition or other relevant factors;</p> <p>e. a clear statement of the nature and guarantee of the approval which statement shall appear in the listing.</p> | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.2.2 Endorsement payments | 8.2.2. | The certification body may receive payment for its work in assessment but shall not receive any non-work related payments such as advertising endorsement payments. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.2.3 Approval system- indications | 8.2.3. | Approval systems shall not allow for any indication of the approval on the product itself. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|--|---|---------|---|---------|----------|
| | 8.2.4 certification of brand name inputs - procedures | 8.2.4. | Where a certification body issues certificates or allows the use of its certification mark on input products, in addition to the measures in 7.2.1 above, the certification body shall document the inspection and certification procedures. This shall clearly indicate: a. the inspection frequency which may be less than annual but no less than once every 3 years; b. the requirements other than the composition of the product that will be checked during inspection and evaluated in making the certification decision. * | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.2.5 Certification of branded inputs - indications | 8.2.5. | The mark used in 8.2.4. may not be the same logo as used for identification of organic produce or suggest that it is organic (from biological origin) unless it is. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| 8.3 certification of smallholder groups | | | | | |
| | 8.3.1 Group certification - | 8.3.1. | Certification bodies that do not require annual inspection of individual growers in smallholder groups shall have policies and procedures to verify compliance of the | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|------------------------------------|---------|---|---------|----------|
| | policy and procedures | | group and the individual growers. The policy and procedures shall at least comply with the following criteria. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.2 Group certification scope | 8.3.2. | The certification body shall limit the scope of such systems to groups that fulfill the following criteria: a. the group shall be constituted of operations with similar production systems; b. large farming units, processing units and traders shall not be included in the inspection arrangements for such groups and shall be inspected annually by the certification body and be individually certified. Simple processing and storage units may be included; c. the group shall be large enough and have sufficient resources to support a viable internal control system that assures compliance of individual operators with production standards in an objective manner; d. the group shall have coordinated marketing, to enable oversight of the product flow. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.3-8.3.5 | 8.3.3. | The policies and procedures for | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|--|---------|----------|
| | Group certification General policy & procedural content | | smallholder group certification systems shall require that at least a. the certified entity shall be the group as a whole. This means that individual operators may not use the certification independently (by marketing as individual producers outside of the group); b. an effective and documented internal control system shall be in place inspections of all operators for compliance with production standards shall be carried out by the internal control system at least annually. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.4 Group certification Contract arrangements | 8.3.4. | The certification body shall require the management body of the group to sign a written contract specifying the responsibilities of the group and of the internal control system. This shall include the requirement that the management obtain signed obligations from all operators to comply with the standards and to permit inspections. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.5 Access to standards for individuals | 8.3.5. | The certification body shall ensure that all operators have access to a copy of the standards or the relevant sections of | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|---|---------|----------|
| | | | standards presented in a way adapted to their language and knowledge. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.6 inspection frequency by the certification body | 8.3.6. | Annual (or more frequent) inspection of the group shall be carried out by the certification body. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.7 Dual nature of inspection | 8.3.7. | The inspection visit shall include both inspection for compliance with the standards and an evaluation of the effectiveness of the internal control system. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.8 Inspection of sample of individuals | 8.3.8. | Inspection of a sample of operators shall be undertaken to fulfill both the functions in 8.3.7. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.9 Size of sample | 8.3.9. | The percentage of operators subject to inspection shall take into account the number of operations involved and their size as well as the degree of uniformity, the production system and the | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|--|---------|----------|
| | | | management structure. The certification body shall specify how it determines the number of growers to be inspected. In cases of groups with less than 1000 operators this shall not be less than 5% or 6, whichever is the higher. In cases of groups with more than one thousand operators this shall not be less than 5% or 100, whichever is the lower. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.10 evaluation of the internal control | 8.3.10 | In evaluating the internal control system the certification body shall assure that: a. internal inspections of all operators have been carried out at least annually; new operators are only included after internal inspections, according to procedures agreed with the certification body; b. sample inspections (see 8.3.8) shall be carried out with the relevant documents from the internal control at hand, and the methods and results of the internal control shall be compared with the results of the inspection to determine whether the inspections of the internal control system have adequately addressed the compliance of operators; c. instances of noncompliance have been dealt with appropriately by the internal control and according to a documented system of sanctions; | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--------------------------------|---------|---|---------|----------|
| | | | d. adequate records of inspections have been maintained by the internal control system; e. internal records match the findings of the certification body's own sample inspections; f. the operators understand the standards. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.11 Witness audit of ICS | 8.3.11. | The evaluation shall include a witness audit i.e. the inspector shall witness a number of internal control inspections. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.12 grower group records | 8.3.12. | In addition to certification records of the groups as a whole, the certification body shall maintain basic data on all operators. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.13 Standardised lists | 8.3.13. | Certification bodies shall have a standardized form to be completed and updated by the smallholder group management. The form shall include identification, name, location (at least on an area map), year of entrance into the certification system, date of last internal and external inspection, number of hectares, cash crops, and yield estimates. | | |
| Comparison : Not addressed by ISO | | | Comment: Sector specific requirement | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--------------------------------|---------|--|---------|----------|
| 65 | | | | | |
| | 8.3.14 Group responsibility | 8.3.14. | The certification body shall hold the group as a whole (the certified entity) responsible for compliance of all operators. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 8.3.15 Group sanctions | 8.3.15. | The certification body shall have a clear sanctions policy in event of noncompliance by the group and/or its operators. Failure of the internal control system to detect and act on noncompliances shall invoke sanctions on the group as a whole. This shall also include provisions for withdrawal of certification from the group where the internal control system has been found to be ineffective. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |

9. ACCEPTANCE OF PRIOR CERTIFICATION

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---------------------------------|--------------------------------|---------|---|-----------------------------|--|
| 9.1 General requirements | | | | | |
| | 9.1.1 Responsibility | 9.1.1 | The certification body shall take full responsibility for recognizing the certification as equivalent to its own. | 4.4 note 2 4.4.a | Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification |
| Comparison: IDEM | | | Comment: | | |
| | 9.1.2 equivalency principle | 9.1.2. | The certification body shall ensure that any accepted product has been subjected to equivalent requirements as product certified by itself. | 4.4. Note 3 4.4.b | Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can satisfy itself regarding the matters detailed in 4.4 b) - ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing, inspection or other technical activities (see clause 2), |
| Comparison: IDEM | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|---|
| | 9.1.3 Product acceptance vs. operator acceptance | 9.1.3. | Acceptance of prior certification on the basis of the criteria in 9.2 and 9.3 shall only be for acceptance of product for use by the certification body's own operators and shall not confer certification status to the operator supplying the product. Acceptance of prior certification of operators seeking certification status shall only be granted on the basis of the criteria in 9.4. | 4.4.a | maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification |
| Comparison: IDEM | | | Comment: | | |
| | 9.1.4 Documented procedures | 9.1.4. | The procedures and responsibility for granting recognition shall be clearly documented. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: This is addressed by the ISO requirements for subcontracted bodies but is not referenced in the notes regarding prior certification | | |
| 9.2 Acceptance of product based on recognition of a certification body | | | | | |
| | 9.2.1 Formal register | 9.2.1. | The certification body shall maintain a formal register of recognized certification bodies. The register shall be subject to periodic review and updated when necessary and shall be available on request. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|--|----------------------------|---|
| | 9.2.2 Methods for acceptance of CBs | 9.2.2. | Inclusion in the register shall only be on the basis of at least one of the following: a. IFOAM accreditation; b. An assessment of equivalency based on a recent and adequate evaluation visit and report conducted either by the certification body granting acceptance or by an appropriate third party. The assessment shall include the equivalency of policies and procedures; relevant production standards and the performance of the other certification body as noted during the visit. The assessment and decision to include a certification body on the register shall be documented, and shall show that criteria equivalent to these criteria have been used; c. An equivalent accreditation performed by an accreditation body contracted to perform IFOAM accreditation or an accreditation body with whom the contracted body has signed an agreement. Where such accreditation does not include assessment of compliance with the IFOAM Basic Standards, the certification body shall conduct a standards equivalency assessment. | 4.4 note 3 4.4.b | The requirements given in 4.4 a) and b) are also relevant, by extension, when a certification body uses, for granting its own certification, work performed by another certification body with which it has signed an agreement ensure that the subcontracted body or person is competent and complies with the applicable provisions of this Guide and other standards and guides relevant to testing, inspection or other technical activities |
| Comparison: IAC additional requirement | | | Comment: The IAC is more restrictive than the general requirements of the ISO65 notes. | | |
| | 9.2.3 Documents of accepted CB | 9.2.3 | Documentation of the registered certification bodies, including standards, | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | inspection and certification procedures and evaluation reports, shall be kept. | | |
| Comparison : Not addressed by ISO 65 | | | | | |
| | 9.2.4 Recognition contract | 9.2.4. | A comprehensive contract (unilateral, bilateral or multilateral) with recognized certification bodies that regulates the obligations of the parties shall be drawn up.. The contract shall at least contain the following provisions: * a. the scope of the mutual recognition, specifying the applicable programs of the certification bodies and any exclusions; b. the procedures and conditions for how a product certified by one party will be accepted by the other; c. obligation to inform the other party in case of loss of accreditation or approval by regulatory authorities; d. the obligation for parties to inform each other of major program or standards changes. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: the general requirement for an agreement is addressed by the ISO requirements for subcontracted bodies but is not referenced in the notes regarding prior certification. In any event the requirement does not stipulate the contents of an agreement | | |
| 9.3 acceptance of product based on document review | | | | | |
| | 9.3.1 Case by case review | 9.3.1. | In the absence of a equivalency agreement or contract of recognition, the certification body shall only accept previous | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--------------------------------|---------|--|---------|----------|
| | | | certification on a case by case review of the product in question. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.3.2 Basis of acceptance | 9.3.2. | The basis of the acceptance shall be an assessment of the information contained in the previous inspection report, last inspection decision and other relevant documents against the standards and certification requirements of the accepting certification body. Acceptance may only be granted if steps have been taken with the other responsible certification body to ensure that the information is accurate, complete and up to date and that no late infringements have occurred. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.3.3 Documented procedures | 9.3.3. | The procedures and responsibility for assessment and decision making shall be documented and follow the normal certification procedure. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.3.4 Period of acceptance | 9.3.4. | Acceptance of such products shall be for a defined period. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|---|---------|----------|
| 9.4 Acceptance of applicants currently certified by another certification body | | | | | |
| | 9.4.1 Criteria for transference of operator certification | 9.4.1. | Certification of an operator may be transferred from another certification body provided all of the following requirements are met: a the other certification body is currently IFOAM accredited; b a contract as detailed in 9.2.4. has been established with the other certification body; c the operator is currently certified by the other certification body and intends to remain certified by them (dual certification). | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.4.2 Transfer without inspection | 9.4.2. | Where the conditions in 9.4.1. are met the operator may be certified without prior inspection provided that the requirements in 9.4.3. are met at the next scheduled inspection. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.4.3 | 9.4.3. | Inspections of the operator shall be carried out by the certification body itself or may | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | Verification of compliance to own standards | | be subcontracted to the other certification body. In cases where the inspection is subcontracted the certification body shall identify any substantial differences between its standards and those of the other certification body and ensure that compliance with these different standards is verified at the inspection visit and documented in the inspection report. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.4.4 Independence of decision making | 9.4.4. | The certification body shall make its own certification decisions based on inspection reports. | 4.4.a | maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification |
| Comparison: IDEM | | | Comment: | | |
| | 9.4.5 Record keeping requirements | 9.4.5. | Appropriate records shall be kept. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.4.6 Exemption of conversion requirements | 9.4.6. | Where the requirements of 9.4.1 and 9.4.3 are not met, acceptance of the operator's current or prior certification shall be limited to the exemption from conversion requirements. Exemption shall only be granted following assessment of relevant historical records, including a recent inspection report, obtained from the other certification body. | | |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|--|---------|---|----------------------------|---|
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| 9.5 Certification partnerships | | | | | |
| | 9.5.1 Cooperation with other CBs | 9.5.1. | Joint ventures, partnerships and similar forms of cooperation with other certification bodies shall comply with the relevant criteria for acceptance of product (9.1 to 9.4) and for subcontracting (1.4.12. to 1.4.15.). | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 9.5.2 Responsibility for cooperative activity | 9.5.2. | The certification body shall take full responsibility for any work done on their behalf by the partner. | 4.4 note 2 4.4.a | Where work related to certification has been undertaken prior to the application for certification, the body may take account of it, provided it can take responsibility as detailed in 4.4 a) take full responsibility for such subcontracted work |
| Comparison: IDEM | | | Comment: | | |
| | 9.5.3 Retention of decision making | 9.5.3. | The certification decision shall not be “subcontracted” to the partner. | 4.4.a | maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification |
| Comparison: IDEM | | | Comment: | | |
| | 9.4.5 Documentation of arrangements | 9.5.4. | The arrangement between the certification bodies shall be documented. | 4.4 | When a certification body decides to subcontract work related to certification (e.g. testing or inspection) to an external |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
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| | | | | | body or person, a properly documented agreement covering the arrangements including confidentiality and conflict of interest shall be drawn up. |
| Comparison : IDEM | | | . | | |

10. STANDARDS DEVELOPMENT

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|---|---------|---|---------|---|
| 10.1 general requirements | | | | | |
| | 10.1.1 Standards compliance with IBS | 10.1.1. | Standards shall either meet or exceed the current IFOAM Basic Standards. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: Sector specific requirement | | |
| | 10.1.2 Standards languages requirement | 10.1.2. | Standards, or the relevant sections of standards, shall be presented in a way adapted to the language and knowledge of operators for all languages declared in the certification body's field of application (See also 2.2.4.). | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| 10.2 standards review | | | | | |
| | 10.2.1 Frequency of review | 10.2.1. | The standards shall be reviewed regularly. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 10.2.2 | 10.2.2. | The certification body shall have adequate procedures for enabling input concerning | 6 | The certification bodyshall take account of views expressed by interested |

| Category | Sub category | IAC ref | IAC text | ISO ref | ISO text |
|---|-------------------------------------|-----------------------|---|---------|---|
| | Input from stakeholders | | revisions from affected parties and shall take these into account. | | parties before deciding on the precise form and effective date of the changes. |
| Comparison: IDEM | | | Comment: | | |
| | 10.2.3 Competency of review body | 10.2.3. | The body responsible for review of standards shall be clearly identified and shall evidence sufficient qualifications or experience to be competent to carry out its functions, or utilize external experts as a means to achieve competency. | | |
| Comparison : Not addressed by ISO 65 | | | Comment: | | |
| | 10.2.4 Notification of changes | 10.2.4. | The certification body shall ensure that each certified operator be notified of changes in the standards without unnecessary delay. | 6 | The certification body shall give due notice of any changes it intends to make in its requirements for certification |
| Comparison: IDEM | | | Comment: | | |
| | 10.2.5 Implementation of changes | 10.2.5. 7.11.2 | The certification body shall have a policy for the normal time periods allowed for implementation of new standards by the operators. Where necessary, an additional time period shall be allowed for operators to implement specific major changes to the standards. In such cases the time for implementation shall be clearly stated. The certification body shall have procedures for the verification of operators' implementation of the required change.s. | 6 | Following decision on, and publication of, the changed requirements, it shall verify that each supplier makes any necessary adjustments within such time as, in the opinion of the certification body, is reasonable. |
| Comparison: IAC additional requirement | | | Comment: The IAC specifies that both a “normal” time and an allowance for specific times are required. ISO65 leaves the time period to the certifiers discretion. | | |