

2025-04-09

Evaluation report (Findings)

Ningxia Shunyuantang Herbal Biotech Co., Ltd., Zhongwei
City, Ningxia Province

JAS_X1, NOP_B, NOP_X, 2018/848 Third
countries_HighRiskProducts, Reg. (EU)
2018/848_Export/Marketing, Reg. (EU) 2018/848_Process,
Reg. (EU) 2018/848_Storage



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1. General information

Client	Ningxia Shunyuantang Herbal Biotech Co., Ltd.		
Address	Xinshui Industrial Park, Xinpu Town, Zhongning County, 755100 Zhongwei City, Ningxia Province, CHINA		
Client representative	Liu Hui		
Assessment team leader	Jieming Qin	Start date	2025-03-08 08:30
		End date	2025-03-08 17:30

2. Scope

Scheme	Assessment type
2018/848 Third countries_HighRiskProducts	Re-assessment
JAS_X1	Re-assessment
NOP_B	Re-assessment
NOP_X	Re-assessment
Reg. (EU) 2018/848_Export/Marketing	Re-assessment
Reg. (EU) 2018/848_Process	Re-assessment
Reg. (EU) 2018/848_Storage	Re-assessment

The assessment was announced.

Applicable regulation:

Control according the Regulation (EU) 2018/848 and its implementing and delegated acts. This document has been issued in accordance with Commission Implementing Regulation (EU) 2021/1698 Art. 14

Japanese Agricultural Standard (JAS) for Organic Products

US National Organic Program (NOP) 7 CFR Part 205

Additional comments of the assessor

Ningxia Shunyuantang Herbal Biotech Co., Ltd. became a client of Kiwa BCS since 2014. The office and factory are both located in Xinshui Industrial Park, Zhongning County, Zhongwei City, Ningxia.

The operator purchases organic ready-made products from suppliers, then re-packing/labeling for export. Only organic products in this project.

On-site inspection on 2025.03.08, all storage rooms, relevant sites and documents were checked. No change this year.

This project was inspected according to EU NOP JAS by KIWA BCS in 2025.

3. Overall conclusion

Products

Products	Scheme	Status	Amount
Adzuki beans	EU 848-TC_B, EU 848-TC_X	Organic	
Adzuki beans	NOP_B, NOP_X	100% organic	
Black Kidney Bean	EU 848-TC_B, EU 848-TC_X	Organic	
Black Kidney Bean	NOP_B, NOP_X	100% organic	
Black soybean with Green Kernel	EU 848-TC_B, EU 848-TC_X	Organic	
Black soybean with Green Kernel	NOP_B, NOP_X	100% organic	
Black soybean with Yellow Kernel	EU 848-TC_B, EU 848-TC_X	Organic	
Black soybean with Yellow Kernel	NOP_B, NOP_X	100% organic	
Buckwheat	EU 848-TC_B, EU 848-TC_X, JAS_X1	Organic	



Buckwheat	NOP _B, NOP _X	100% organic	
Buckwheat kernel	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Buckwheat kernel	NOP _B, NOP _X	100% organic	
Dried jujube (red dates)	EU 848-TC_B, EU 848-TC_X	Organic	
Dried jujube (red dates)	NOP _B, NOP _X	100% organic	
Flax seed	EU 848-TC_B, EU 848-TC_X	Organic	
Flax seed	NOP _B, NOP _X	100% organic	
Goji berry, dried	EU 848-TC_B, EU 848-TC_X, JAS _X1, NOP _B, NOP _X	Organic	
Millet	EU 848-TC_B, EU 848-TC_X	Organic	
Millet	NOP _B, NOP _X	100% organic	
Mung bean	EU 848-TC_B, EU 848-TC_X	Organic	
Mung bean	NOP _B, NOP _X	100% organic	
Pinenut kernel	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Pumpkin Kernels (GWS, Shine Skin, Snow White)	EU 848-TC_B, EU 848-TC_X	Organic	
Pumpkin Kernels (GWS, Shine Skin, Snow White)	NOP _B, NOP _X	100% organic	
Pumpkin seed	EU 848-TC_B, EU 848-TC_X	Organic	
Pumpkin seed	NOP _B, NOP _X	100% organic	
Pumpkin seed kernel, shine skin	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Pumpkin seed kernel, shine skin	NOP _B, NOP _X	100% organic	
Pumpkin seed, GWS	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Pumpkin seed, GWS	NOP _B, NOP _X	100% organic	
Pumpkin seed, shine skin	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Pumpkin seed, shine skin	NOP _B, NOP _X	100% organic	
Pumpkin seeds, Snow white	EU 848-TC_B, EU 848-TC_X	Organic	
Pumpkin seeds, Snow white	NOP _B, NOP _X	100% organic	
Rose flower, dried	EU 848-TC_B, EU 848-TC_X	Organic	
Rose flower, dried	NOP _B, NOP _X	100% organic	
Soybean	EU 848-TC_B, EU 848-TC_X	Organic	
Soybean	NOP _B, NOP _X	100% organic	
Sunflower seed	EU 848-TC_B, EU 848-TC_X	Organic	
Sunflower seed	NOP _B, NOP _X	100% organic	
Sunflower seed kernel	EU 848-TC_B, EU 848-TC_X, JAS _X1	Organic	
Sunflower seed kernel	NOP _B, NOP _X	100% organic	



4. Assessment findings

4.1. Nonconformities (JAS) and issues of concern (NOP)

No nonconformities were observed during the assessment.

4.2. Opportunities for improvement

No opportunities for improvement were observed during the assessment.

4.3. Nonconformities previous assessment

There were no open nonconformities, that were observed during the previous assessment.

5. Assessment data

5.1. Assessment activities

On-site inspection on 2025.03.08, all storage rooms, relevant sites and documents were checked. No change this year.

5.2 Additional information

The certification proposal in this report doesn't allow to sell the listed products with the assigned status. Until you receive a new certificate the decisions of the current valid certificate allow the merchandising of the thereon listed products.

The company is informed, that the report can be sent to surveillance authorities or other control organisations.

Confirmation of the operation

- a) The operator has witnessed the onsite assessment.
- b) The operator agrees to fulfil the defined corrective measures, conditions and / or sanctions. This includes possible changes during the following certification process.
- c) The operator has carefully checked the products to be certified and listed in the inspection report – and confirms their correctness and completeness. The operator is aware and accepts that any later amendment or change of the products may lead to a delayed certificate issuance and/or to additional costs.
- d) The operator has provided all certification-relevant documents. The operator has noted that in case of incomplete documentation, resp. delayed submission of missing documents, the assessment process will not be closed!. At the moment of sending the missing information (if relevant, with operator's signature), the final closing of the inspection report will be proceeded and the respective closing date will be registered. From that date onwards, Kiwa BCS will calculate the time needed for carrying out the certification which in turn might be in delay because of the late submission of the missing documents and as a result of those circumstances, Kiwa BCS will not be able to extend the certificate in time.
- e.1) If it is the first JAS inspection, the operator confirms that a JAS training was conducted by the Kiwa BCS inspector in the presence of the responsible persons (farmer/owner, production manager, Grading Manager, etc.). The details are given in the findings report (JAS Training questions). All relevant aspects concerning the specific JAS requirements (e.g. grading of labelling, etc.) were presented, discussed and understood.
- e.2) If applicable, the operator confirms that JAS training was conducted for the new responsible personnel and/or JAS up-date trainings were carried for the responsible persons. The details are given in the findings report (JAS Training questions).

Signature assessor:

Signature client:



6. Detailed findings

JAS_X1, NOP_B, NOP_X

INT BCS Organic/NOP/JAS/OSKSA	-
General Information	
Was the OSP reviewed together with the operator point by point during inspection? Including: - Current organic certificates - Flow charts - Maps Reviewed OSP with Liu Hui on-site.	✓ Yes
Have serious problems been detected during the inspection that require immediate reaction? Not found.	✗ No
Organic System Plan (OSP) and organic knowledge	
Is the OSP in accordance with the actual conditions? The OSP is in accordance with the actual conditions.	✓ Conform
Was the OSP updated during inspection? Updated during inspection, refer to Approved-230309.	✓ Conform
Kiwa BCS will be informed about relevant changes by (date): Always before inspection.	✓ Conform
Is the sketch-map of the processing unit up-to-date and includes all infrastructures and their functions? Submitted in 2020.	✓ Conform
Has the address of the company/client or of a sub-unit changed? No change this year.	Not applicable
Has the name of the company/client or of a sub-unit changed? No change this year.	Not applicable
Has a sub-unit changed? (cancelled or newly contracted) No sub-units.	Not applicable
NOP National List of Allowed and Prohibited Inputs - restrictions	-
Has the operator submitted a compliant input approval procedure, including a description for verification of restrictions? Not use any inputs.	Not applicable
Has the operator submitted a compliant input approval procedure, including a description for verification of restrictions? Not use any inputs.	Not applicable
Incoming goods	



Is it assured that only organic products are accepted from suppliers who have a valid certificate? All MCs were submitted before inspection and checked on-site.	✓ Conform
Are labels of incoming organic products checked to verify that only organic products are accepted? Verified the labels before receiving organic products.	✓ Conform
Are delivery documents checked by the operator if they coincide with the labelling of the product? Verified the delivery documents before receiving organic products.	✓ Conform
In case of wrong labelling/delivery documents is the reaction of the operator adequate to correct this? Would reject receiving these products, but not happened.	✓ Conform
In case of reception of conv. and org. products: Are sufficient separation measures (spatial or temporal) used (please explain) to avoid commingling? Receive them in different time, and stored in the organic warehouse.	✓ Conform
Are separation measures at reception of goods sufficient and effective? Receive them in different time, and stored in the organic warehouse.	✓ Conform
Have the existing SOPs regarding incoming JAS raw material and/or products been implemented accordingly? Checked them according to SOPs.	✓ Conform
Precaution measures and separation	
Does the operator contract sub-units to handle (and/or store) the organic product within his own certification? No sub-units.	Not applicable
In case of processing and handling of conv. and org. products: are separation measures (spatial or temporal) used (please explain) to avoid commingling? Repacked or relabeled in the different time, before handling, the relevant site would be cleaned completely.	✓ Conform
Were the ongoing organic production and/or production related activities inspected? No relabel/repack activities during inspection due to no market order. But warehouse and relevant documents were checked on-site.	✓ Conform
In case of processing and handling of org. products certified to different standards: are separation measures (spatial or temporal) used (please explain) to avoid commingling? No processing, only relabel/repack in different time.	✓ Conform
Are separation measures sufficient and effective? Verified on-site.	✓ Conform
If the same infrastructure is used for processing/re-packing of conventional and organic products: Is the cleaning in between processes adequate? No processing, only relabel/repack in different time. Before handling, the relevant site would be cleaned completely.	✓ Conform



In case of processing and handling of conv. and org. products: Are effective measures taken during loading and transport to avoid substitution or mixing?	✓ Conform
Vehicles would be cleaned completely. The organic products were packed and labelled well.	

Is it assured that during loading and transport of organic products contamination with prohibited substances cannot occur?	✓ Conform
Vehicles would be cleaned completely. The organic products were packed and labelled well.	

Is only pure/potable water without any additives used for washing organic products? In case additives are use please describe!	Not applicable
No washing.	

Is it assured that the washing water does NOT represent any risk of chemical or microbiological contamination?	Not applicable
No washing.	

Export: Storage

In case of storage of conv. and org. products: are separation measures (spatial or temporal) used (please explain) to avoid commingling?	✓ Conform
Only organic products. The org. products were stored in the dedicated areas, packed and labelled well.	

In case of storage of org. products certified according to different standards: are separation measures (spatial or temporal) used (please explain) to avoid commingling?	✓ Conform
Stored in the dedicated areas with different labels.	

Are separation measures sufficient and effective?	✓ Conform
Verified on-site.	

Is it assured that during storage, loading and transport of organic products contamination with prohibited substances cannot occur?	✓ Conform
Vehicles would be cleaned completely. The organic products were packed and labelled well.	

Has Kiwa BCS been informed about all storage rooms?	✓ Conform
All storage rooms were checked.	

Processing: Storage

Is labelling during storage of organic products adequate to assure separation from conventional products?	✓ Conform
The org. products were stored in the dedicated areas, packed and labelled well.	

Is labelling during storage of organic products adequate to assure separation between products certified according to different organic standards?	✓ Conform
Stored in the dedicated areas with different labels.	

Sanitation, disinfection and pest control

Are products/substances used for sanitation and disinfection of equipment approved for food industry?	✓ Conform
Only physical methods are used in the warehouse, such as light killer, mouse sticking, etc.	



After using cleaning or disinfection agents, are surfaces coming in contact with organic products rinsed with pure water? Not use these substance.	Not applicable
In case of use of rodenticides, are these placed in covered traps (not allowed for EU)? No used rodenticide.	Not applicable
Is it assured that NO ionizing radiation is used in the production/re-packing of the organic product? No used ionizing radiation.	✓ Conform
Are procedures and practices for pest management designed to prevent infestation rather than to treat it? Only physical methods are used in the warehouse, such as light killer, mouse sticking, etc.	✓ Conform
Is the facility pest management implemented in compliance with NOP? Only physical methods are used in the warehouse, such as light killer, mouse sticking, etc.	Not applicable
Are only physical or biological measures, resp. allowed substances used for pest control? Only physical methods are used in the warehouse, such as light killer, mouse sticking, etc.	✓ Conform
Documentation/records	
Are cleaning measures/procedures documented? Checked on-site.	✓ Conform
Does the operator contract sub-units to handle the organic product within his own certification? No sub-units.	Not applicable
If sub-units are contracted by the operator, are internal contracts available between the inspected operator and the sub-unit? No sub-units.	Not applicable
Do the internal contracts regulate at least the following: <input type="checkbox"/> The sub-unit's obligation to meet the requirements of the relevant organic standard? <input type="checkbox"/> The exclusive marketing of certified organic products handled by the sub-unit? No sub-unit.	Not applicable
Are ALL organic certificates of suppliers of organic products valid and on file? All MCs were checked on-site and kept by operator.	✓ Conform
Is repacking sufficiently documented? Checked on-site.	✓ Conform
Do the records of incoming/out-going organic products contain name of supplier/buyer, product, quantity and organic quality? Contained supplier name, quantity, lot no., CB, etc.	✓ Conform



Is processing sufficiently documented? Trade project, no processing.	Not applicable
Are documents related to organic processing, commerce, handling/re-packing and marketing marked as such and are they distinguishable from other documents? No processing. Documents would be marked with “organic”, standards, etc.	Not applicable
Does a complaint file exist, mentioning complaints about certified products, the corresponding corrective actions taken as well as persons responsible? Not complaint happened yet.	Not applicable
Organic quality is sufficiently taken into account by the quality management? Comprehensive quality management system has been built in the company and strictly implemented, this certainly include the handling of organic products in the company.	✓ Conform
Has the operator established a complaint handling/management? The complaint management was built and worked well.	✓ Conform
If so: Are appropriate actions taken and are they documented - in case of a complaint? No happened since last inspection.	Not applicable
Have the existing SOPs regarding documentation been implemented accordingly? From last inspection until now, no organic products were processed according to JAS organic regulation.	Not applicable
Have the form sheets - indicated in the SOPs – been used properly? According to the updated SOPs, however, no single batch of JAS product sold/exported since the last inspection.	Not applicable
Have the SOPs been reviewed according to the clients own regulations? Verified on-site.	✓ Conform
If SOPs were up-dated: Was the staff informed about the changes? Would inform staff immediately once SOPs changed.	✓ Conform
Is the list/inventory of the devices used for the organic production (repacking + storage) complete and updated? No changed.	Not applicable
Is the JAS relevant documentation filed properly? According to the updated SOPs, however, no single batch of JAS product sold/exported since the last inspection.	✓ Conform
Grading Manager (GM): Is she/he the same as the last year? Please write her/his name(!) Grading manager can only be the same person as the PPMD in small family businesses, but not in bigger ones with employees etc. (!) Mr. Huang Qingsong.	✓ Conform
Are technical qualification and/or practical experience of the Grading Manager sufficient? Mr. Huang Qingsong has been working in the field of agricultural products such as goji berries for more than 37 years, owns rich experience on the production and trade of organic products.	✓ Conform



Did the grading manager receive a JAS training? Please fill the attached file of Jas training and upload it! Trained by Kiwa BCS inspector in 2022. And he also attended the Seminar hold by Kiwa BCS China in Wuyuan of Jiangxi in March of 2023.	✓ Conform
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In case of a Grading Team: Is the staff the same as the last year? Please write the name(s) of all members of the grading staff(!) No Grading team.	Not applicable
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Are technical qualification and/or practical experience of all members of the grading staff sufficient? No Grading team.	Not applicable
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Did all members of the grading staff receive a JAS training? Please fill the attached file of Jas training and upload it! No Grading team.	Not applicable
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In case of re-packing: Is the Grading Manager substantially independent from the sales department? Verified on site.	✓ Conform
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Re-Packer – incl. deputy, if relevant: Is she/he the same as the last year? Please write her/his name(!) Mrs. Liu Hui.	✓ Conform
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Are technical qualification and/or practical experience of the re-packer – and the deputy - sufficient? Mrs. Liu Hui has worked for Ningxia Shunyuantang for more than 12 years, and she has rich experience on the production of organic agricultural products and foods.	✓ Conform
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Did the re-packer – and the deputy - receive a JAS training? Please fill the attached file of Jas training and upload it! She was trained in 2022 by Kiwa BCS inspector, and also attended the Seminar hold by Kiwa BCS China in Wuyuan of Jiangxi in March of 2023.	✓ Conform
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Labelling/Traceability/Packaging

Is there a traceability system in place that assures: Agriculture/Aquaculture/Beekeeping/Wild collection: documents the status, quantity and origin of all products entering the unit(s), and also documents the status, quantity and buyers of products leaving the unit(s)? Please complete attached excel table!! On all levels of processing, so that products or ingredients can be traced back to their supplier/origin? In case that the company buys and sells organic products: is traceability assured so that each outgoing product can be traced back to its supplier or origin? Since last inspection, no any organic flow, so choose a conventional product to verify it, refer to Anx1.	✓ Conform
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<p>During the traceability audit, could it be verified that the records are congruent with f.ex....</p> <p>1. the OSP? 2. written procedures? 3. staff interviews? 4. observations?</p> <p>Since last inspection, no any organic flow, so choose a conventional product to verify it, refer to Anx1. The traceability documents of org. products are congruent with OSP, staff, it has been verified last inspection.</p>	<p>✓ Yes</p>
<p>Have kind and quantity of ingredients, additives and processing aids been disclosed?</p> <p>Trade project. No processing, mono products.</p>	<p>Not applicable</p>
<p>Do the recipes correspond to the labels and list of ingredients?</p> <p>Mono products.</p>	<p>Not applicable</p>
<p>Are organic products transported only in appropriate packaging and in such a manner that mixing of the content is prevented?</p> <p>Organic products were always packed and labelled well.</p>	<p>✓ Conform</p>
<p>Is it guaranteed that the micro-organisms added or any other processing aids or food additives, are not (made from) GMOs?</p> <p>Mono products, no these substances used.</p>	<p>✓ Conform</p>
<p>Does the operator use the BCS-Logo?</p> <p>- If so: does the operator have a Contractual Agreement with BCS for using the BCS Logo? - If NOT: is a Contractual Agreement filled out and signed by the operator - attached to this report?</p> <p>Used. The contractual agreement was signed in 2018.</p>	<p>✓ Conform</p>
<p>NOP: Retail Label</p>	<p>-</p>
<p>Does the label of the products leaving the unit contain the statement "certified organic by..." along with the certifiers (Kiwa BCS Öko-Garantie GmbH) name and is placed below the information identifying the handler or distributor of the product?</p> <p>Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_AnX02_2020.</p>	<p>Not applicable</p>
<p>Does the label of the products leaving the unit contain the statement "certified organic by..." along with the certifiers (Kiwa BCS Öko-Garantie GmbH) name and is placed below the information identifying the handler or distributor of the product?</p> <p>Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_AnX02_2020.</p>	<p>Not applicable</p>
<p>Has the operator presented all final product (retail) labels to Kiwa BCS and has the inspector specifically addressed this to the operator that all labels must be presented?</p> <p>Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_AnX02_2020.</p>	<p>Not applicable</p>
<p>Has the operator presented all final product (retail) labels to Kiwa BCS and has the inspector specifically addressed this to the operator that all labels must be presented?</p> <p>Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_AnX02_2020.</p>	<p>Not applicable</p>



Does the operator use final product (retail) labels? Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_Anx02_2020.	Not applicable
Does the operator use final product (retail) labels? Only used inner label and export label, not use retail labels. All necessary information was included in the label. Refer to OSP_Anx02_2020.	Not applicable
NOP: Copacking	-
Does the operator carry out subcontracted activities on behalf of other companies, such as processing, sorting, packing (copacking), labelling, etc.? No processing or co-packing of organic products for other companies.	Not applicable
Does the operator carry out subcontracted activities on behalf of other companies, such as processing, sorting, packing (copacking), labelling, etc.? No processing or co-packing of organic products for other companies.	Not applicable
If the operator carries out subcontracted activities on behalf of other companies has the operator presented all labels he is using under that activity? No processing or co-packing of organic products for other companies.	Not applicable
If the operator carries out subcontracted activities on behalf of other companies has the operator presented all labels he is using under that activity? No processing or co-packing of organic products for other companies.	Not applicable
Does the label of the finished products or products to be transported to other units (non-retail container) contain all required information? All necessary information was included in the label. Refer to OSP_Anx02_2020.	✓ Conform
Are all processing aids as well as any other substance used IN or ON the organic product allowed for organic production? Trade project, no processing.	Not applicable
In case first inspection, changed labeling requirements or change of the company's label: is a (new) label draft available and attached to this report? Old client and no changes this year.	Not applicable
Did (or will) the grading manager authorize the use of the JAS label only when the grading result was positive? No single batch of JAS product exported since last inspection.	Not applicable
Are all used non agricultural ingredients allowed for organic products/production? Trade project, no processing.	Not applicable
Are all used non-organic agricultural ingredients allowed for organic products? Trade project, no processing.	Not applicable
In case that non-organic agricultural/non agricultural ingredients are used: are proofs available that show that those ingredients are not commercially available in NOP organic quality? Trade project, no processing.	Not applicable
Is (or will it be) the grading document filled out completely and signed by the grading manager - every time a lot is (or will be) labelled with the JAS label? No single batch of JAS product exported since last inspection.	Not applicable
Does the label of the finished products/wild crops or products to be transported to other units or to be sold/exported contain the required information? All necessary information was included in the label. Refer to OSP_Anx02_2020.	✓ Conform



Export and marketing/sales

Are organic products being exported by the company? The organic products are exported by Ningxia Shunyuantang.	✓ Conform
Does the company buy and sell readymade organic products from other companies? Trade project, operator will purchase readymade organic products, then relabel/repack, sell finally.	✓ Conform
Does the company buy and sell organic products from other companies? Checked on-site.	✓ Conform
Product flow check	-
Has a volume flow check - for each organic standard - been done (fill in the respective excel sheets of the QM document: D_EN_09-230 (A, A1, A4-B-X); D_EN_09-231 (A2, B,X); D_EN_09-232 (A3, B, X) depending on the scope of the operator) and proven to be consistent? Please upload the mentioned QM document with the requested information! Refer to Anx2.	✓ Conform
Has a volume flow check - for each organic standard - been done (fill in the respective excel sheets of the QM document: D_EN_09-230 (A, A1, A4-B-X); D_EN_09-231 (A2, B,X); D_EN_09-232 (A3, B, X) depending on the scope of the operator) and proven to be consistent? Please upload the mentioned QM document with the requested information! Refer to Anx2.	✓ Conform
In case of first inspections: No organic products are available but the operator had only processed conventional products. Was a mass balance audit performed with conventional products? Not first inspection.	Not applicable
In case of first inspections: No organic products are available but the operator had only processed conventional products. Was a mass balance audit performed with conventional products? Not first inspection.	Not applicable
In case the operator did not produce/ process/ sell any products, he still has to be able to present an appropriate system that provides security that traceability checks can be conducted in the future. Was this verified? Since last inspection, no any organic flow, so choose a conventional product to verify it, refer to Anx1.	✓ Conform
In case the operator did not produce/ process/ sell any products, he still has to be able to present an appropriate system that provides security that traceability checks can be conducted in the future. Was this verified? Since last inspection, no any organic flow, so choose a conventional product to verify it, refer to Anx1.	✓ Conform
Has a volume flow check - for each organic standard - been done and proven to be consistent?. Fill in the respective excel sheets of the QM document: D_EN_09-230 (A, A1, A4-B-X); D_EN_09-231 (A2, B,X); D_EN_09-232 (A3, B, X) Please upload the mentioned QM document with the requested information! Refer to Anx2.	✓ Conform



In case of exports: is it assured that containers have NOT been treated with pesticides before loading? Not treated.	✓ Conform
In case containers are treated or if not known: are organic products packed in a way that contamination is prevented? The containers are not treated.	✓ Conform
Can the number of JAS certified and labelled products be derived clearly from the operator's sales statistic? No export or sale of JAS organic products after last inspection.	Not applicable
Does the company buy and sell JAS products from other farmers/companies, who are ready for final sale (Re-packing)? According market orders, company will purchase readymade organic products from JAS certified suppliers, then repack and sell.	✓ Conform
Did the farmer/company prepare and submit a complete list of all JAS sales (to Japan / to other countries - 1. April to 31. March of the following year) by 31 May – at the latest – to BCS? It shall be done should there be any JAS products delivered.	✓ Conform
Outgoing products	
Are organic products transported to other units in such a manner that contamination or substitution/mixing of the content is avoided? Always packed and labeled well.	✓ Conform



Reg. (EU) 2018/848_Process

Preliminary checks	
Has the operator sent evidence to close the open non-conformities from previous assessment? Please, comment for each open NC into the Implementation evidence field	Not applicable
No open non-conformity.	
Company description (description of operation) / general information / general method (practice)	
The declaration of commitment has been signed and corresponds to the conditions. Refer to OSP-Decl.	✓ Yes
The operating description with all information on units, operating sites as well as all plans and other information is available and corresponds to the conditions? Among the available information, when applies: - The business description for the area of crop production with all information about practices on all units - The operating description of wild collection activities with all information on collected areas - The operating description of the livestock husbandry with all information on units - The operating description of the beekeeping activities with all information on units - The operating description of the aquaculture activities with all information on units - The operating description of the processing, labeling and handling activities with all information on units - The company description related to exporting activities and the last handler of the organic product - The operating description for the production of feed - The operating description of all activities, information on units, operating sites of products mentioned in Anx. I Checked on-site.	✓ Conform
The Kiwa BCS form D-DE_09-450_RISK_ ... is currently available. Refer to Risca-250308.	✓ Yes
Does the operator have a written precautionary measure plan? Refer to OSP-Anx2-PMP-250212.	✓ Yes
Are the precautionary measures appropriate and proportionate to identify and avoid the risk of contamination with non-authorized substances at each stage of production, preparation and distribution? Refer to OSP-Anx2-PMP-250212.	✓ Conform
Have the measures described in the plan complied with other relevant requirements of this Regulation and is regularly reviewed and adjusted if applies? Refer to OSP-Anx2-PMP-250212.	✓ Conform
In case, the operator suspects that its certified product has been contaminated with a non-authorized, has he fulfilled the steps described in the regulation regarding this subject? For instance: Has he informed to Kiwa BCS? Has he identified and separated the product concerned?, Has the product sold and labeled as organic? , etc? Please explain. Refer to OSP-Anx3-Survey processing program-250212.	✓ Conform



Operation has outlined in the OSP, or ANX of OSP, how organic conversion and non-organic products are stored and processed separately. Describe it in OSP, organic products were stored in the special zone, processed in the different time. Before organic handling, relevant site would be cleaned.	✓ Conform
The information on contracting out to third parties in the operating description is up to date and corresponds to the current conditions in the company? No third parties in this project.	Not applicable
The written consent of the subcontractors that their operation is subject to the control procedure according to EU Regulation 2018-848 Art 34 (1), (3) (subcontractor declaration of commitment) is available? No subcontractors in this project.	Not applicable
Operation of several units / non-organic units complies with the requirements of the Regulation? The separation measure is effective, also checked on-site.	✓ Conform
Have all units or premisses been visited during the inspection?. The operator shall grant the inspection body access for inspection purposes to all parts of the unit and to all premisses, as well as to the books and all relevant supporting documents, and shall provide all information. If applies, including the premisses of the subcontracted operations (without own certification) All relevant sites and documents were checked on-site.	✓ Conform
Does the company take risk-oriented samples from the inventory and have analyses carried out? Not happened yet.	Not applicable
The procedure in the event of suspicion of the presence of unauthorized products and substances in a product that is to be used or marketed in accordance with Regulation 2018/848 complies with the requirements of the Regulation. Refer to OSP-Anx3-Survey processing program-250212. But not happened yet.	✓ Conform
In the event of a suspicion, the information provided by the company complies with the requirements of the Regulation. Refer to OSP-Anx3-Survey processing program-250212.	✓ Conform
Processing	
If applies, separation to processing of non-organic products is adequate and sufficient? Trade project, no processing.	Not applicable
The composition of the processed food (type and quantity of ingredients) has been disclosed and complies with the Regulation and Annex II? Trade project, mono products.	Not applicable
The water used is of drinking water quality / the salt used complies with the specifications of the regulation? Not use water.	Not applicable
The use of colorants complies with the specifications of the Regulation. Not use colorants.	Not applicable
The use of minerals, vitamins, amino acids and micronutrients complies with the regulation. Not use these substance.	Not applicable



The use of microorganisms and enzymes complies with the specifications of the regulation. Not use microorganisms and enzymes.	Not applicable
Only non-organic agricultural ingredients listed in IA 2021/1165 Annex V or for which an exemption has been granted by the competent authority are used in the processing of organic food. Mono products.	Not applicable
Evidence of approvals for the use of non-organic agricultural ingredients is available. Mono products.	Not applicable
An organic ingredient does not co-occur with the same non-organic ingredient or ingredient produced during conversion. Mono products.	Not applicable
Food from plants produced during conversion contains only one vegetable ingredient of agricultural origin. Trade project, mono products.	Not applicable
No substances and processes are used to "whitewash" organic food. Trade project, checked on-site.	Not applicable
The production of yeasts and yeast extracts as well as food and feed containing yeasts or yeast extracts comply with the Regulation and its annexes? Not yeasts and yeast extracts products.	Not applicable
The use and documentation of cleaning, stock protection measures during processing complies with the requirements of the EU regulation? Checked on-site.	✓ Conform
No use of GMO/GMO derivatives? Confirmations? No use of GMO/GMO derivatives.	✓ Conform
Ionizing radiation for the treatment of organic food or feed or the raw materials used therein is not applied. No use of ionizing radiation.	✓ Conform
The principles of good manufacturing practice are observed. Checked on-site.	✓ Conform
Reporting of suspected violations and irregularities by the company complies with the requirements of the Regulation? Would investigate it once suspected violations and irregularities according to Survey processing program. But not happened yet.	✓ Conform
How are the essential oils extracted? Are the methods used in line with organic the objectives, principles and the organic regulation? No essential oils processing.	Not applicable
Is the operator producing one of the followings products: production of plant-based traditional herbal preparations and essential oils. Trade project, not process these products.	Not applicable
Every single activity and quantities processed are available and updated Checked on-site.	✓ Conform

Incoming & outgoing goods / bookkeeping



The company keeps financial records? Verified on-site.	✓ Conform
Incoming goods books contain seller, supplier, date, type, quantity, organic quality of raw materials, time. for collective transports? Contain product name, lot no., CB, suppliers, etc.	✓ Conform
Sellers/suppliers are subject to the control procedure? The control procedure contain this part content, verified on-site.	✓ Conform
Are closures, container labels and goods accompanying documents checked for completeness and compliance with the requirements of the Organic Regulation? These documents were checked by operator when receiving organic products.	✓ Conform
Is the result of the incoming goods inspection documented according to the information in the company description? It was documented by operator. Checked on-site.	✓ Conform
Are GMO freedom declarations currently available? Not contain this part in this trade project.	Not applicable
Was there an appropriate response in the case of incorrect labeling? Would correct them immediately.	✓ Conform
The accounting system at the subcontractor is complete and complies with the requirements of the Regulation? No subcontractor.	Not applicable
The accompanying documents (delivery bills, invoices) comply with the requirements of the regulation. Verified on-site.	✓ Conform
Incoming goods documents. contain seller, supplier, date, type, quantity, organic-qual. of the products, Verified on-site, contain supplier, quantity, etc.	✓ Conform
Goods receipt documents. contain recipient of goods, supplier, date, type, quantity, organic-qual. of raw materials? Verified on-site, contain supplier, quantity, etc.	✓ Conform
Mass balance calculation	
The traceability is coherent? Which product were selected to do the traceability exercise, explain? Use the approved document to this purpose. Since last inspection, no any organic flow. So choose a conventional product to verify it, see Anx1.	✓ Conform
The inventory data are available. Refer to Anx2.	✓ Conform
The quantity reconciliation is coherent (use the template created for this purpose) and there is no discrepancy when checking the primary data (sample check; e.g. outgoing invoice book, debtors)? Refer to Anx2, also checked on-site.	✓ Conform



<p>Did you fill in accordingly the mass balance and traceability exercise for the current operation? Describe how the products were selected for the exercise (risk oriented, e.g. volume, high yield, etc.) Which of the following documents have you reviewed/consulted? Refer to Anx1 & 2, but for traceability verify, a conventional product was choose due to no any org. flow since last inspection.</p>	<p>✓ Yes</p>
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<p>Harvest record Trade project, not harvest record.</p>	<p>Not applicable</p>
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<p>Way bill / delivery note of incoming product Refer to Anx1.</p>	<p>✓ Yes</p>
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<p>Weight protocol Refer to Anx1.</p>	<p>✓ Yes</p>
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<p>Storage book / stock inventory Refer to Anx2 and photos.</p>	<p>✓ Yes</p>
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<p>Sales invoice Refer to Anx1.</p>	<p>✓ Yes</p>
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<p>Delivery note (sale) Bill of lading Refer to Anx1.</p>	<p>✓ Yes</p>
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<p>Bank account excerpts of payments Not paid and receive payment yet in this traceability documents.</p>	<p>Not applicable</p>
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<p>Others: Refer to Anx1.</p>	<p>✓ Yes</p>
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<p>Stock physically counted Refer to Anx2 and photos.</p>	<p>✓ Yes</p>
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Storage

<p>The storage of organic products complies with the requirements of the EU Regulation? Checked on-site.</p>	<p>✓ Conform</p>
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<p>The keeping of financial records complies with the requirements of the EU Regulation? The required information for org. products in financial records would be marked clearly.</p>	<p>✓ Conform</p>
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<p>The use and documentation of cleaning and stock protection measures during storage comply with the requirements of the EU Regulation on the Protection of Chemicals in the Food Chain and Animal Feed. The clean records were checked on-site.</p>	<p>✓ Conform</p>
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Transport / labelling

<p>Closure or specifications fulfilled and the accompanying document contains the mandatory information? Contained required information.</p>	<p>✓ Conform</p>
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Sealing or specifications of non-sealed transports are adhered to? Packed well.	✓ Conform
The specifications for collective transports are complied with? Checked on-site.	✓ Conform
The transport of feed complies with the requirements of the EU regulation? No feed products.	Not applicable
The transport of live fish is carried out according to requirements of the regulation? No live fish.	Not applicable
Labelling (label) / advertisement	
Are the labeling regulations for products from hunting and fishing correctly implemented on the accompanying documents (delivery bills, invoices, etc.)? Not hunting and fishing project.	Not applicable
The labeling requirements for product from conversion to organic farming are correctly implemented on goods accompanying documents (delivery bills, invoices, ...)? Trade proje	Not applicable
The labeling regulations of the regulation for pre-packaged food and for outer packaging are complied with? See photos. It complies with Regulation.	✓ Conform
The labeling regulations of the regulation for unpacked food are complied with? No unpacked products.	Not applicable
Does the operator label products or substances used in crop production as defined in Art. 31? Trade project.	Not applicable
The code number of the inspection body to which the operator that carried out the last production or preparation operation? Verified on-site.	✓ Conform
The form and arrangement of the code number and the indication of origin comply with the regulation? Verified on-site.	✓ Conform
The EU organic logo is used only on products and packaging whose producers, suppliers, importers are in the control procedure and whose certificate is available? Verified on-site.	✓ Conform
The Community logo used on the labels complies in shape, color and size with EU Regulation 2018/848 Annex V? Refer to OSP_Anx02_2020.	✓ Conform
The use of the indication of origin complies with the requirements of the Regulation? (small quantities by weight of ingredients may be disregarded, provided that the total quantity of the disregarded ingredients does not exceed 5 % of the total quantity by weight of agricultural raw materials) Verified on-site.	✓ Conform
The code number of the inspection body is displayed correctly on the website? It will be used according to EU regulation if necessary.	✓ Conform



The use of other logos complies with the requirements of the regulation?	✓ Conform
Used BCS LOGO, the contractual agreement was signed in 2018. It complies with BCS policy and EU regulation.	

Processed feed

Organic feed materials or in-conversion feed materials shall not be used together with the same feed materials from non-organic production to produce an organic feed.	Not applicable
Not processed feed project.	

Substances and processes that restore properties lost during processing and storage of organic feeds or correct the result of negligent processing or may otherwise be misleading as to the true nature of these products shall not be used.	Not applicable
Not processed feed project.	

The use of synthetic chemical solvents is avoided in the production of animal feed.	Not applicable
Not processed feed project.	

Only straight feeding stuffs and feed additives approved in the regulations are used in the production of feed.	Not applicable
Not processed feed project.	

The use of feed additives and processing aids complies with the requirements of the regulation	Not applicable
Not processed feed project.	

The use of non-organic straight feeding stuffs complies with the requirements of the regulation.	Not applicable
Not processed feed project.	

Trademarks and sales descriptions for feed containing a claim according to EU Regulation 2018/848 Art. 30 (6) are only used if all ingredients of plant or animal origin are from organic production and at least 95% of the TM of the product consists of such ingredients.	Not applicable
Not processed feed project.	

The labeling according to EU Regulation 2018/848 Art. 30 (1) and the use of the EU organic logo on processed feed comply with the requirements of the Regulation?	Not applicable
Not processed feed project.	

Records of all production inputs used in feed production are available. For compounded products, complete recipes/formulas are available indicating input and output quantities.	Not applicable
Not processed feed project.	

Closure or specifications fulfilled and label and accompanying document contain the mandatory information and can be clearly assigned to the packaging, container or means of transport of the product ?	Not applicable
Not processed feed project.	

The labeling of in-conversion feed complies with the requirements of the regulation	Not applicable
Not processed feed project.	

The labeling of compound feed complies with the requirements of the regulation	Not applicable
Not processed feed project.	

Complementary/additional procedures



Was a sample taken during the assessment? -> Be sure that you have filled in the checklist Sample taking and upload the corresponding evidence in Files.	✘ Remark
Not take sample on-site.	

Has the operator involve in a residue case ? -> Please upload any relevant information for as part of the investigation	✘ Remark
Not involved in a residue case.	

Please describe the methods and techniques applied in order to conduct the assessment?	Not applicable
Not take sample on-site.	

Reg. (EU) 2018/848_Export/Marketing

Does the export activity (sales in general) done by the operator comply with the requirements of the EU Regulation?	✔ Conform
Operati according to OSP and EU regulation.	



2018/848 Third countries_HighRiskProducts

The excel file about incoming and outgoing products has been attached? Remember that ALL high risk products must be assessed and included in the file. See Anx3. No any HRP inventory.	✓ Yes
Please specify, for each crop/product, how it is stored and transported. For each HRP (high risk product) describes the following and attach an example of the label used: Product: X -> Location (for instance: own farm, subcontractor's name, etc) -> Stored/packed in (for instance: bulk in tank, bags of 50kg, etc) -> Labels: attach them ->Transport to the next location in: (for instance: polyethylene Bags 40 kg, labelled, Bulk on truck, bags of 50kg, etc) Always packed and labeled well, see photos.	✓ Conform
Is any post-harvest or storage treatment applied directly to the organic product? (with substances such as chlorine, pesticides, disinfectants, or similar, or methods such as radiation, or similar) Not treated for organic products.	✗ No
Are storage spaces, barns, tanks, etcetera treated (with fumigants, other pesticides, cleaning agents such as chlorine products, other)? Not treated.	✗ No
Are the storage spaces treated? Not treated.	✓ Yes
Are products stored in the storage during treatments? Please explain how a contamination is avoided if organic product stay in the storage room while this is treated. Not treated in the storage, always packed and labeled well.	✗ No
What is the procedure for deciding if and when it is safe to store products in the operator's storage space(s)? No such treatment.	✓ Conform
Is an assigned person responsible for clearance of premises after a treatment, and is this clearance documented? By sweeping(physical cleaning), no other treatment at all.	✓ Yes
How is contamination of product during transport avoided? Products were always packed well. The trucks were cleaned completely before loading organic products.	✓ Conform
For packed products: Is there a risk of contamination by the packaging material itself? Cleaned paper cartons(outer) and PE bags(inner), no risk.	Not applicable
Has the bookkeeping system and banking data been verified during inspection? The bookkeeping system and transfer data were checked on-site.	✓ Yes
Does the operator sold HRP while the additional control applies? Then, Please choose three sales (from excel table in-outgoing products and indicate the corresponding invoice numbers or TC/COI numbers here: No any high risk products were sold since last inspection.	Not applicable



<p>If agricultural or processed products are purchased by the operator, please choose three purchases (from in-outgoing products and indicate the corresponding invoice numbers or TC/COI numbers here:</p> <p>No any high risk products were purchased since last inspection.</p>	<p>✗ No</p>
<p>NOP_B</p>	
<p>Has the operator submitted an explanation on how they verify if the operation's OSP is implemented and how they update their OSP in case of changes?</p> <p>See point 14 in OSP.</p>	<p>✓ Yes</p>
<p>Has the operator submitted a compliant fraud prevention plan using the Kiwa BCS format?</p> <p>Refer to OSP-Anx1-FPP-250212.</p>	<p>✓ Conform</p>
<p>Is the operator working with non-certified entities which are exempt from certification and are they listed in the OSP?</p> <p>Not worked with non-certified entities.</p>	<p>✗ Remark</p>
<p>Is the operator using boiler systems?</p> <p>Trade project, not these process steps, not used it.</p>	<p>Not applicable</p>
<p>Does the operator use non-retail labels?</p> <p>Used inner label and export label.</p>	<p>✓ Yes</p>
<p>Has the operator submitted one example for each product group?</p> <p>Refer to OSP_Anx02_2020.</p>	<p>✓ Yes</p>
<p>Do the non-retail labels identify the product as organic?</p> <p>Refer to OSP_Anx02_2020. Also checked, see photos.</p>	<p>✓ Yes</p>
<p>Do the non-retail labels display the production lot number, shipping identification, or other unique information that links the container to audit trail documentation?</p> <p>Checked on-site.</p>	<p>✓ Yes</p>
<p>Does the audit trail documentation for nonretail containers identify the last certified operation that handled the agricultural product?</p> <p>Checked on-site.</p>	<p>✓ Yes</p>
<p>Is the operator producing mushrooms?</p> <p>Not produce mushrooms.</p>	<p>Not applicable</p>
<p>Has the operator correctly filled out the OSP Annex for Mushroom production?</p> <p>Not produce mushrooms.</p>	<p>Not applicable</p>