

General requirements for the conversion of crops and plant products

For plants and plant products to be considered organic, the production rules referred to the Reg. (EU) 2018/848 and its delegated and implementing acts must have been applied on the parcels during a conversion period of at least

- **two years** before sowing for annual crops
- or, in the case of grassland or perennial forage, at least **two years** before its use as feed from organic farming,
- or, in the case of perennial crops other than forage, at least **three years** before the first harvest of organic products

Kiwa BCS may decide to recognise retroactively as being part of the conversion period any previous period under the conditions defined in Art. 10 Point 3. (b) of the Reg. (EU) 2018/848 and Art. 24 of the Reg (EU) 2021/1698, provided that the measures concerned ensure that products not authorized for organic production have not been used on those parcels, or the parcels were natural or agricultural areas which were not treated with products not authorised for organic production. The period referred to in the first subparagraph can be taken into consideration retroactively only where satisfactory proof has been furnished to Kiwa BCS, allowing it to satisfy itself that the conditions were met for the defined period.

For further information, please refer to and validation of previous agricultural management.

Details for the derogation request

Please consider that a retrospective recognition of 1, 2 or 3 years for your crop or land is an exception to the rule described above.

If you wish to apply for retroactive recognition of your crop/crops or land for EU, USDA NOP or JAS, either 1, 2 or 3 years, you must first consider meeting at least one of the following basic considerations, if you do not meet one of them a recognition cannot be applied for.

- a. Virgin soil (with the exclusion of primary forests)
- b. Fallow and uncultivated land for at least 3 years
- c. Abandoned plantations, proved not cultivated during 3 years. Harvest possible. Low input agriculture (such as traditional agricultural systems, agro forestry system, meadows etc.)
- d. Land under agricultural cultivation or management, being part of a public/governmental program or being under the supervision of a competent responsible authority which has visited and supervised the agricultural practices in the past, mainly focused on the inputs used during the supervised period.

If you comply with a), b) or c) abandoned plantations, after the documentary evaluation by the certification body, a pre-inspection will be necessary to verify the veracity of the information provided and the non-application of prohibited substances during the previous 3 years. If the land complies with c) agriculture with low use of inputs and d), a pre-inspection may be necessary. The decision will be communicated with the written response to this application. The pre-inspection by Kiwa BCS must begin prior to any tillage, sowing, harvesting, pruning or any other work being done on the plots involved. In any case, a sample will be required depending on the risk analysis evaluation of the documentary evidence delivered with this application.

Please submit this application to Kiwa BCS **prior** to any tillage, sowing (if applies) harvesting, pruning or any other work being done on the plots involved. Starting work on the plots without an affirmative decision from Kiwa-BCS may result in non-recognition.

This application is mandatory only for the EU standard. It is not mandatory for other standards.

You will receive a written response to your request within 10 working days, if the information you have submitted is complete.

Application for retrospective recognition of conversion period



Applying Operator (certificate holder)	
Company Name:	
Client Number:	
Website:	
P.O. Box / Street:	
Zip Code / Town:	
Province / State:	
Country:	
Address of production site (if not the company)	
Company Name:	
P.O. Box / Street:	
Zip Code / Town:	
Province / State:	
Country:	
Contact data of responsible person for questions	
Name:	
Phone:	
Mobile:	
E-mail:	

- Approval to this application refers to the designated plots / crops only, as noted in the table "list 1".
- As for all used farm inputs (fertilizers, crop protection products), all related receipts and invoices and technical information about inputs, must be kept available at any time.
- Retrospective approval of conversion is an exception in the certification process. Therefore, Kiwa BCS will charge an additional fee for this application, whether the application is approved or not.

I, the applicant for retrospective approval of conversion of plots or crops, on the following pages confirm that:

- the provided information on this and the next pages fully and accurately represents the operation and the listed plots.
- I have fully understood all information provided by Kiwa BCS and agree to the conditions.
- I will inform Kiwa BCS immediately about any changes of the information provided.
- the filled in and signed application form, and all annexes, will be sent to the Kiwa BCS office.

Please remember:

- To complete the retroactive recognition of the transition period, it is normally required that the plots be inspected by Kiwa-BCS inspectors before any work is done on the land.
- **To keep all documentary evidence related to this request for at least 3 years.**

Place and date

Signature

Specific information regarding previous management of new areas

Explanatory statement

Please state the reasons why you are requesting retroactive recognition for the land or crop(s) listed in list 1.

Has the land been certified organic in the past? If so, please answer the following:

Which certification body (Add copy of certificate)					
From when to when?	-	To which standard		equivalent to	<input type="checkbox"/> EU <input type="checkbox"/> NOP <input type="checkbox"/> JAS

What was the reason for stopping the previous certification?

Please answer the following questions:

- If your crop has been monitored by a government agency or competent authority, please describe how the monitoring has been carried out (*date monitoring began, frequency of monitoring, what the monitoring consisted of*). Please include to this application the monitoring reports carried out by the authorities.
- If the land has been cultivated/cropped: has any renewal of the crop/crops or reseeded been carried out within the last 3 years? Yes No
If YES, please comment on the origin of the seeds or propagation material used (own, certified organic, conventional). Please attach evidence, and information about the type of treatment in case of using conventional seeds or propagation material).
- If the plants used in the seeding or replanting were of invitro production, please comment and provide information on the management of the plants (fertilization records, phytosanitary control records, technical information on the inputs applied) after leaving the laboratory and until they were planted in the open field.
- How were weeds, pests and diseases of the crop(s) managed during the last 3 years? Have any inputs been used? *Please attach a list of all inputs (fertilizers and pesticides) used on the plots in the last 3 years and attach the data sheets for each of the inputs, and the purchase invoices (see above).*
- Do you have adequate knowledge of organic farming principles and organic standards? yes No
Please explain and attach evidence.

In case of a group of operators, do the ICS staff as well the group members have adequate knowledge of organic farming principles and organic standards? yes No

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Please submit a detailed description of the plots you are considering for retroactive recognition of the transition period:

- Is it: land without crops:
 case a) virgin land, or
 b) fallow or uncultivated land?
- Is it: cropped land:
 c) abandoned plantations or low input agriculture
 d) land under supervision of a program of a competent authority, or
 of another control body?
- In cases c) and d), please provide a detailed description of your production system, the crops currently grown on the plots, and your agricultural practices on the plots.
- Please indicate the start date of the transition period that you wish to be recognized retrospectively:

Please attach the following information

Type of document	Annex mandatory?	Annex number
– Maps of the land, including areas that have other uses (such as other crops, forest, pastures etcetera)	yes	
– Technical data sheets for inputs used in the past 3 years (technical data sheets including information about active ingredients, inerts and production process; certificates of compatibility if available)	when applicable, mandatory (if inputs have been use on the plots)	
– Third party confirmations (NGOs, neighbours, etc) confirming organic management of the land or crops in the past 3 years	No (hand in only if available)	
Document detailing the monitoring by the governmental body or competent authority (the document should mention the name of the producer(s), the area of the crop and the farm, the time of monitoring, what activities have been carried out in the monitoring, how it confirms that the producer(s) comply with the requirements of the organic standard).	when applicable, mandatory (case (d) above, in case of an established crop with use of inputs)	
<ul style="list-style-type: none"> • Information on seeds or propagation material used in the plots: • Information on origin and status (organic or conventional untreated). • If untreated conventional seed or propagation material has been used, submit 3 confirmations of non-availability as organic, one confirmation of non-chemical treatment from the seed supplier and one confirmation of non-GMO status from the seed supplier. • If in-vitro plants have been used, present information that evidences the dates of exit from the laboratory, the organic handling of the plants in the nursery, and the date of delivery to the producer for planting in open field. 	When applicable, mandatory (if you have used such material on the land within the last 3 years)	
– Records of fertilization, phytosanitary control, weed control, post-harvest process, sowing, reseeded, of the crop(s) to request retroactive recognition*).	When applicable, mandatory (use of inputs in the last 3 years)	

Application for retrospective recognition of conversion period



– Invoices of purchase of all supplies, during the past 3 years*).	When applicable (use of inputs in the last 3 years)	
– Invoices of purchase of seeds or propagation material*).	When applicable (use of such material in the last 3 years)	
Other, please detail - if applicable:		

*) In the case of a group of operators, submit with this application the documents of at least 20% of the producers requesting retroactive recognition. In the on site inspection, 100% of these documents must be available for random verification.

All attachments must be sent to Kiwa BCS along with this application.

Field history of previous 3 years:

- plots have been under the management of the applicant
- Plots have **not** been under the management of the applicant:

Name(s) and address of former responsible(s) of the land:

Name:

Address:

Country:

Telephone and e-Mail:

Application for retrospective recognition of conversion period



List 1: Details of plots for which retrospective acceptance of conversion period is sought. Please list history of last three full years

Year	Plot No. and / or name	Geolocation coordinates	Area [ha]	Crop	Name/variety of all used seeds or planting material	Origin (organic, conventional, own)	Used inputs		How do you qualify the management of the fields? ¹
							Name of used inputs	Date of use	
This year: 20									
Previous year: 20									
Two years ago: 20									
Three years ago: 20									

Note: If there is not enough space, please use an additional sheet to list all plots. In case of group certification, include the information in the group list format. Fill out one sheet for each year.

¹ Please select one of the following terms: abandoned land, low use of inputs, high use of inputs, certified under (mention here the regulation/s), other (describe)

This part is for internal use of Kiwa BCS and will be filled in by the technical reviewer or certifier

Response by the technical reviewer/certifier:

After analysing carefully, the documentary evidence the request has been:

approved not approved

Due to the following reasons: (give a detail information of why the application was approved or rejected)

If it is necessary to make different decisions for different plots, please comment, indicating the plot code and the corresponding decision.

In addition, the risk analysis carried out based on the documentary evidence determine that the following parcels/fields (soil and/or plant) must be sampled in the coming inspection²:

Describe in detail whether soil and/or plant must be sampled. If it is necessary to make different sample, please comment, indicating the plot code and the corresponding decision

Will an on-site pre-inspection be required before granting the retroactive recognition derogation?

yes No

In the on-site pre-inspection or the on-site inspection (any that occurs first), the following aspects should be verified:

Date: _____

Signature of responsible person at
Kiwa BCS:

Name of responsible person at
Kiwa BCS

Dear operator, please bear in mind that you must keep all documentary evidence related to this request for at least 3 years.

² In the on-site pre-inspection or the on-site inspection (any that occurs first)