

<b>Comparison between ISO Guide 65 &amp; IROCB</b>				<b>Comparison Remarks</b>
<b>General requirement for bodies operating product certification systems</b>		<b>International Requirements for Organic Certification Bodies</b>		
<b>Clause No.</b>	<b>ISO 65</b>	<b>Clause No.</b>	<b>IROCB</b>	
		<b>1.</b> <b>1.1.</b>	<p><b>Introduction</b></p> <p>This document sets out international requirements for organic certification bodies (IROCB). These requirements are intended to represent a consensus on good practices in organic conformity assessment among private and public institutions. They aim to provide a baseline for assessing the equivalence of services performed by various certification bodies outside a specific organic system. The IROCB would thus serve as a tool for enabling recognition of those certification bodies' services in international trade by other certification bodies and systems, so that governments or accreditation/approval bodies could approve each other's requirements as equivalent in order to allow products certified to enter the system.</p> <p>Application of these requirements is intended to ensure that certification bodies provide third party certification of organic operators in a consistent and reliable manner. If an evaluation reveals that a certification body is performing organic certification in line with these requirements it should be considered competent to conduct organic certification.</p> <p>IROCB is based upon the requirements in ISO/IEC Guide 65: 1996 (E) "General requirements for bodies operating product certification systems." However,</p>	<p><b>Different but not conflicting objectives</b></p> <p>IROCB may be regarded as an amplification of ISO 65 for a specific sector usage.</p> <p>ISO 65 introduction underline it is written as general criteria for product certification which may have to be amplified when specific industrial or other sectors make use of them.</p> <p>IROCB introduction underline objectives of document as representing an international sector specific consensus on good practices in organic conformity assessment as well as a baseline for assessing equivalence of organic certification services performed by certification bodies of different regulatory and accreditation systems. Content of IROCB is based on ISO 65 as well as IFOAM Criteria, the two international certification norms used for organic certification.</p>

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			<p>given that organic certification has certain features that differ from certification of products and services covered by ISO/IEC Guide 65, IROCB also takes into account the IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing (IAC) and includes sector-specific requirements. It also includes reformulated and amended ISO paragraphs and additional requirements to cover issues confronting a certification body when undertaking organic certification.</p> <p>In general, existing regulations must be applied and laws respected. Moreover, it must be noted that a certification body's authority often is restricted under regulatory systems compared to the requirements outlined in ISO/IEC Guide 65 and IAC. Certification bodies are mandated to perform functions on behalf of authorities, which reserve the right to take final decisions or exercise control (e.g. complaints resolutions, withdrawal of certification, ownership of logo). The document does not cover organic production standards. It is recommended that equivalence of organic production standards be judged according to internationally recognized standards or guidelines such as IFOAM Basic Standards and the Codex Guidelines CAC/GL 32: Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods.</p>	
1. 1.1	<p><b>Scope</b></p> <p>This guide specify general requirement that a third party operating a product certification system shall meet if it is to be recognized as</p>	1.2	<p><b>Scope</b></p> <p>IROCB specifies baseline requirements that a certification body conducting organic certification shall meet if it is to be recognized as component.</p>	<p><b>Different but not conflicting scope</b></p> <p>According to scope of document, ISO Guide 65 is applicable as a general requirement for all product certification systems whereas</p>

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	competent and reliable			IROCB is specifically applicable to only organic certification. Note: organic certification is certification of both a production method as well as products of the system.
1.2	<p>The certification system used by the certification body may include one or more of the following which could be with production surveillance or assessment and surveillance of the suppliers quality system or both as describe in ISO/IEC guide 53:</p> <p>a) Type testing or examination;</p> <p>b) Testing or inspection of samples taken from the market or from supplier stock or from a combination of both;</p> <p>c) Testing or inspection of every product or of a particular product whether new or already in used.</p> <p>d) Batch testing or inspection</p> <p>e) Design appraisal</p>	1.2.1.	<p><b>Evaluation methods</b></p> <p>Evaluation methods shall consist of document review, appraisal of quality management systems and on-site inspection visits. Sample analyses and testing should serve as supporting tools to verify information.</p> <p>Evaluation methods shall be applied systematically according to defined procedures. Procedures shall address initial and ongoing evaluation in order to assess whether a production process continues to meet the applicable organic standard.</p>	<p><b>Different but not conflicting use of assessment methods.</b></p> <p>ISO Guide 65 emphasizes on testing of products whereas IROCB requires evaluation methods to appraise quality management systems on an on-going basis with testing only as supporting tools for verification of information.</p>
		1.2.2.	<p><b>Chain of custody</b></p> <p>The certification body shall assure that any product used by an operator in a product subject to its certification is duly certified (see section 2.1.4 regarding the acceptance of prior certification).*</p> <p><i>*Explanatory note: For example, when a certified operation purchases raw material certified by another program for being processed in multi-ingredient product for which the respective operator</i></p>	<p>ISO Guide 65 introduction notes some certification system may include assessment of its suppliers' quality systems. IROCB specifically requires certification to address operator's supply chain.</p> <p>Note: Maintaining product integrity throughout the product chain of custody is an important component of organic certification.</p>

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			<i>seeks certification.</i>	
4.	<b>Certification body</b>			
4.1	<b>General provisions</b>	2.	<b>General requirements:</b>	
4.1.1	The Policies and procedure under which certification body operates and their administration shall be non-discriminatory, and shall be administered in a non-discriminatory manner. Procedure shall not be used to impede or inhibit access by applicant other than as specified in this guide.	2.3.4.	<p><b>Accessibility</b></p> <p>The certification body shall make its services equally accessible to all applicants whose activities fall within its declared field of operation.</p> <p>It shall work according to non-discriminatory policies and procedures, ensuring that no undue financial (e.g. with regard to the fee structure) or other conditions* are applied.</p> <p><i>*Explanatory note: access shall not be conditional upon, for example, the size of the supplier, or membership of any association or group, or number of certificates already issued.</i></p>	<p><b>Similarly addressed by different requirement(s)</b></p> <p>IROCB 2.3.4 meets ISO 65 4.1.1 &amp; 4.1.2</p>
4.1.2	The Certification body shall make its service accessible to all applicants whose activities fall within its declare field of operation. There shall not be undue financial or other conditions. Access shall not be conditional upon the size of supplier or membership of any association or group, nor shall certification be conditional upon the number of certificate already issued.			
4.1.3	The criteria against which the products of a supplier are evaluated shall be those outlined in specified standards. Requirements for standards suitable for this purpose are contained in ISO/IEC guide 7. If explanation is required as to the application of these documents for a specific certification system, it shall be formulated by relevant	3.1.1	<p><b>Information for operators</b></p> <p>The certification body shall provide to operators an up-to-date description of the procedures to be applied for conducting certification. The certification shall inform operators about</p> <p>c. The applicable standards</p>	<p><b>Similarly addressed by different requirement(s)</b></p> <p>Applicable standards are separately provided. IROCB is silent on requirement that formulation of explanation of application of applicable standards and requirements be done by relevant and impartial committees or</p>

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	and impartial committees or person processing the necessary technical competence published by the certification body.			responsible competent person. However, this would be obvious as the information given to the operator forms the basis of the certification agreement (see below).
4.1.4	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.	2.1.2.	<b>Certification agreement</b> The certification body shall provide its certification service based on an agreement signed by the applicants and operators. In particular, the agreement shall	<b>Similarly addressed by different requirement(s)</b>
			a. Include a description of the rights and duties of the applicants and operators offering certified products, including a commitment to comply with the relevant provisions of the certification program;	
			b. Specify requirements, restrictions or limitations on the use of the designated certification logo and on the ways of referring to the certification granted in order to prevent misleading use or claims;	
			c. Contain provisions to allow the certification body to exchange information with other certification bodies and authorities (approval bodies or accreditation bodies) to verify information, especially the certification status of certified products, as part of its ongoing evaluation;	
		d. Provide to both the certification body and the responsible authorities the right of access to all appropriate facilities, including to non-organic production in the unit or related units, and all relevant documentation and records, including financial records.		
		3.3.2.	<b>Basis for the decision</b>	

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			The decision shall be based solely on the conformity of the operation with the certification requirements specified, using information gathered during the evaluation process.	
4.2	<b>Organization:</b>	2.1.1.	<b>Legal structure:</b>	
	The structure of the certification body shall be such as to foster confidence in its certification. In particular; certification body shall:		The structure of the certification body shall foster confidence in its certification operations. In particular, the certification body shall	<b>Similar requirement</b>
	a) Be impartial;	2.3.1.	<b>Organizational structure and stakeholder involvement</b> The certification body shall be impartial; it shall not be financially dependent on single operations that are subject to its certification in any way that compromises its impartiality.	<b>Similar requirement</b>
	b) Be responsible for decisions relating to the granting, maintaining, extending, reducing, suspending and withdrawing of certification;	2.1.3.	<b>Responsibility for certification decisions</b> a) The certification body shall have final responsibility for granting, maintaining, extending, suspending and withdrawing certification.	<b>Similar requirement</b>
	c) Identify the management (committee, group or person) which shall have overall responsibilities for all of the followings: 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;	2.1.1.	c. Identify the management (body, group or person) that has overall responsibility for the functioning of the certification body, including its finances.	<b>Similar requirement</b>

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	3. Decision 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 individual as required, to undertake define activities on its behalf; 7. Technical basis for granting certification;			
	d) Have documents which demonstrate its a legal entity;	2.1.1.	a. Have documents attesting to its status as a legal entity;	<b>Similar requirement</b>
	e) Have a documented structure which safeguards impartiality, including provisions, to ensure the impartiality of the operations, of the certification body;	2.3.1.	Specifically, the certification body shall have a documented structure which safeguards impartiality by: a. Including provisions to ensure the impartiality of the operations of the certification body; and	<b>Similar requirement</b>
	f) this structure shall enable participation of all parties significantly concern in the development of policies and principles regarding the content and functioning of the certification system;		b. Providing for the participation of all parties concerned in a way that balances interests and prevents commercial or other interests from unduly influencing decisions.* <i>* Explanatory note: a committee representing key interests such as those of clients, other industry representatives, representatives of government services, or representatives of nongovernmental organizations, including consumer organizations could be established to consider whether the certification body management meets the structural requirements.</i>	<b>Similar requirement</b>  Note: IROCB identifies and list key stakeholders clearly in explanation note.

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	g) Ensure that each decision on certification is taken by a person(‘s) different from those who carried out the evaluation;	3.3.1.	<b>Division of functions</b> The certification body shall ensure that each decision on certification is taken by a person(s) or committee different from the one(s) that carried out the inspection.	<b>Similarly addressed by different requirement(s)</b>
	h) Have rights and responsibility relevant to its certification activities;	2.1.1.	b. Have documented the rights and responsibilities relevant to its certification activities; and	<b>Similar requirement</b>
	i) Have adequate arrangements to cover liability arising from its operation and/or activities;			IROCB does not address arrangements for liabilities.
	j) Have the financial stability and resources required for the operation of a certification system;	2.3.1.	<b>Organizational structure and stakeholder involvement</b> The certification body shall be impartial; it shall not be financially dependent on single operations that are subject to its certification in any way that compromises its impartiality.	<b>Similarly addressed by different requirement(s)</b> IROCB does not have a general requirement for financial stability. However, it requires that the organisation is financially independent enough to maintain impartiality.
	k) Employee a sufficient number of personal having the necessary education, training, technical knowledge and experience for performing certification function relating to the type, range and volume of work perform under a responsible senior executive;	2.2.1.	<b>General</b> a. The certification body shall employ sufficient personnel competent to perform certification functions and operate its system. b. The certification body shall ensure that personnel have knowledge relevant to the scope of certification issued (farming operations, processing facilities, geographic areas, group certification).	<b>Similar requirement</b>
	l) Have a quality system giving confidence in its ability to operate a certification system for products;	2.5.1.	<b>General</b> a. The certification body shall define, document and implement a quality management system in accordance with the relevant elements of these requirements so as to impart confidence in its ability	<b>Similar requirement</b> ISO65 requirement is for general product certification whilst IROCB is specifically focused on organic certification.

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			to perform organic certification. The quality management system shall be effective and appropriate for the type, range and volume of work performed.	
	m) Have policies and procedure that distinguish between product certification and any other activities in which the certification body is engaged;	2.3.3.	<p><b>Division of functions</b></p> <p>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. In case the certification body also performs other activities in addition to certification, it shall apply additional measures to ensure that the confidentiality, objectivity and impartiality of its certifications are not affected by these other activities.</p>	Similarly addressed by different requirement(s)
	n) 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;	2.3.2.	<p><b>Management of impartiality</b></p> <p>The certification body shall identify, analyse and document the possibilities for conflicts of interest arising from its provision of certification, including any conflicts arising from its relationships. Rules and procedures shall be established to prevent or minimize threat of conflicts of interest. In particular, the certification body shall</p> <p>a. Require personnel, committee and board members to declare existing or prior association with an operation subject to certification. Where such an association threatens impartiality, the certification body shall exclude the person concerned from work, discussion and decisions at all stages of the certification process related to the potential conflict of interest;</p> <p>b. Follow defined rules for appointing and operating</p>	Similarly addressed by different requirement(s)

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			committees involved in certification activities to ensure that decisions taken are not influenced by any commercial, financial and/or other interest.	
	o) Have formal rules and structure for the appointment and operation of any committee which are involved in the certification process; such committees shall be free from any commercial, financial and other pressure that might influence decision a structure where member are chosen to provide a balance of interest, where no single interest predominant, will be deemed to satisfy this provision;	2.2.5.	<b>Assignment of committees</b> The certification body shall have formal rules and structures for the appointment and operation of any committees that are involved in the certification process, reflecting requirements of 2.2.1 and 2.2.2.	<b>Similarly addressed by different requirement(s)</b>
		2.3.2.	<b>Management of impartiality</b> The certification body shall identify, analyse and document the possibilities for conflicts of interest arising from its provision of certification, including any conflicts arising from its relationships. Rules and procedures shall be established to prevent or minimize threat of conflicts of interest. In particular, the certification body shall a. Require personnel, committee and board members to declare existing or prior association with an operation subject to certification. Where such an association threatens impartiality, the certification body shall exclude the person concerned from work, discussion and decisions at all stages of the certification process related to the potential conflict of interest; b. Follow defined rules for appointing and operating committees involved in certification activities to ensure that decisions taken are not influenced by any commercial, financial and/or other interest.	
	p) Ensure that activities of related bodies do not affect the confidentiality, objectivity or impartiality of its	2.3.2.	<b>Management of impartiality</b> The certification body shall identify, analyse and	<b>Similarly addressed by different requirement(s)</b>

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	certification and shall not:	2.3.2.	document the possibilities for conflicts of interest arising from its provision of certification, including any conflicts arising from its relationships.	Similarly addressed by different requirement(s)
		2.3.3.	<p><b>Division of functions</b></p> <p>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. In case the certification body also performs other activities in addition to certification, it shall apply additional measures to ensure that the confidentiality, objectivity and impartiality of its certifications are not affected by these other activities. In particular the certification body shall not</p>	IROCB elaborates requirement clearer than ISO 65.
	1) Supply or design products of the type its certify;		a. Produce or supply products of the type it certifies;	
	2) Give advice or provide consultancy services to the applicants as to method of dealing with matters which are various to the certification requested		b. Give advice or provide consultancy services to the applicant/operator as to methods of dealing with matters which are barriers* to the certification requested.**	
	3) Provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decision.		<p>* Explanatory note: barriers can be, for example, non-conformities identified in the course of the certification process.</p> <p>**Explanatory note: explanations regarding the standard production standard are not considered to be advice or consultancy. General information or training may be given as long as this service is offered to all applicants/operators in a non-discriminatory manner.</p>	
	q) Have policies and procedure for the	2.5.6.	<b>Appeals and complaints</b>	Similarly addressed by different

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	resolution of complaints, appeals and disputes received from suppliers or other parties about the handling of certification or any other related matters;		The certification body shall have in place policies and procedures for the resolution of complaints and appeals received from operators or other parties about the handling of certification or any other related matters.	<b>requirement(s)</b>
		<b>2.1.4.</b>	<p><b><u>Acceptance of prior certification</u></b></p> <p>Where products in the production chain have been certified by other certification bodies, the certification body may accept prior certification according to defined procedures. Acceptance* may be granted when equivalent certification procedures have been applied.</p> <p>* Explanatory note: there could be varying acceptance situations to be covered by appropriate acceptance procedures. For example,</p> <ul style="list-style-type: none"> <li>• Acceptance of certificates issued by another certification body under the same certification program and authority;</li> <li>• Acceptance of certificates issued by another certification body working under a different certification program and authority;</li> <li>• Certification bodies collaborating based on a defined agreement.</li> </ul>	ISO guide 65 does not cover this requirement which may be very important while developing common requirements for CBs certifying organic as well as other products.
4.3	<p><b>Operations</b></p> <p>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 (see clause 3). The certification body</p>	1.2.1.	<p><b>Evaluation methods</b></p> <p>Evaluation methods shall be applied systematically according to defined procedures. Procedures shall address initial and ongoing evaluation in order to assess whether a production process continues to meet the applicable organic standard</p>	<b>Similarly addressed by different requirement(s)</b>

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	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.	3.1.1	<b>Information for operators</b> The certification body shall provide to operators an up-to-date description of the procedures to be applied for conducting certification. ....	
		3.2.1.	<b>Scope</b> a. The certification body shall evaluate operators against all certification requirements specified. The evaluation shall consist of a review of documents and an on-site inspection visit.	
	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/IED Guides 25, 39 and 62.	2.2.3.	<b>Capacity-building</b> The certification body shall ensure that personnel involved in certification (i.e. inspectors and other certification personnel, including members of technical committees) have and continue to have up-to-date technical knowledge in their respective fields of activity to enable them to conduct evaluation and certification effectively and uniformly. In particular, the certification body shall a. Review the competence of its personnel in light of their performance in order to identify training needs; and b. Ensure that new personnel have sufficient competence.*	<b>Not equally addressed</b> Competence of inspection is addressed but IROCB is silent on the competence of bodies carrying out testing of samples.  Note: Testing is only a supporting tool for verification of information in organic certification.
4.4	<b>Subcontracting</b>  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	2.2.6.	<b>Subcontracting (outsourcing)</b>  When a certification body decides to subcontract work (outsourcing) related to certification (e.g. inspection) to an external body or person, an agreement covering the arrangements, including confidentiality and conflict of interest, shall be drawn	<b>Similarly addressed</b> Requirement is about properly documented agreement including confidentiality and conflict of interest. Testing is just an example.

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	confidentiality and conflict of interest shall be drawn up. The certification body shall		up. The certification body shall	
	a) Take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification.		a. Take responsibility for such subcontracted work. b. Keep final responsibility for the granting, maintaining, renewing, extending, suspending or withdrawing of certification. Delegation of certification decisions may only take place based on the requirements in accordance with the provisions of the ISO/IEC GUIDE 68:2002(E).	<b>Similarly addressed by different requirement(s)</b>
	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), 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;		c. Ensure that the subcontracted body or person is: • Competent to perform the subcontracted work, • Not involved, either directly or through the body/person's employer, with the operation, process or product that is subject to certification in any way that may compromise impartiality, and • Committed to the policies and procedures as defined by the certification body . . d. Monitor the performance of the persons or bodies subcontracted for the work.	<b>Similarly addressed</b>
	c) Obtain the applicant's consent.			<b>Not addressed</b> IROCB does not require obtaining applicant's consent for sub-contracting work.
	<i>Notes:</i> <i>2. where work related to certification has been undertaken prior the application for certification the body may take account of it, provided it can take responsibility as</i>			

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	<i>detailed in 4.4 a and satisfy itself regarding the matters detailed in 4.4 b.</i>			
	<i>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.</i>			
4.5	<b>Quality system</b>	2.5.	<b>Quality management system</b>	
		2.5.1	<b>General</b>	
4.5.1	<p>The management of the certification body having executive responsibility for quality shall define and document its policy for quality and its objective for and commitment to, quality. The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization.</p> <p>The certification body shall operate an effective quality system in accordance with the relevant elements of this guide and appropriate to the type, range and volume of work performed.</p>	2.5.1.	<p>a. The certification body shall define, document and implement a quality management system in accordance with the relevant elements of these requirements so as to impart confidence in its ability to perform organic certification. The quality management system shall be effective and appropriate for the type, range and volume of work performed.</p> <p>b. The management shall ensure that the quality management system is understood, implemented and maintained at all levels of the organization.</p>	<b>Similarly addressed by different requirement(s)</b>
	<b>This quality system shall be documented and the documentation shall be available for use by the certification body staff.</b> The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. The	2.5.2.	<b>Management system manual</b> <p>a. The certification body shall address and document all applicable procedures, either in a manual or in associated documents, in order to ensure uniform and</p>	<b>Not equally addressed</b> Documentation of quality system and availability of document to staff are similarly addressed. IROCB allows flexibility for applicable

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	certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for	2.5.2.	consistent application.	procedures to be addressed in quality manual or associated documents. IROCB is silent about designating a person having authority to establish, implement and maintain the quality management system.
	a) Ensuring that a quality system is established, implemented and maintained in accordance with this guide, and		c. The certification body shall ensure that the manual and relevant associated documents are accessible to all relevant personnel.	
	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.			
4.5.3	The quality system shall be documented in a quality manual and associated quality procedures, and the manual shall contain or refer to at least the following:		<b>Management system manual</b> b. The manual and associated documents, as appropriate for the type, range and volume of work performed, and considering the number of personnel involved in the process, shall contain:	
	a) A quality policy statement;		<b>Similarly addressed in general requirement 2.5.1.</b> ISO65 is more explicit about defining 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;		IROCB does not specifically require inclusion of legal status and owners in quality manual.	
	c) The names, qualifications, experience and terms of reference of the senior executive and other certification		IROCB does not specifically require inclusion of documentation of qualifications and TORs of personnel in quality manual.	

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	personnel, both internal and external;			
	d) An organization chart showing lines of authority responsibility and allocation of functions stemming from the senior executive;		• An organizational chart showing lines of authority, responsibilities and allocation of functions;	<b>Similar requirement</b>
	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;			IROCB does not specifically require description of organization as outlined in ISO 65 in quality manual.
	f) The policy and procedures for conduction management reviews;		• Policy and procedures for reviewing quality (e.g. internal audits, management review).	<b>Similar requirement</b>
	g) Administrative procedures including document control;			IROCB does not specifically require description of administrative procedures in quality manual.
	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;		• A description of procedures applied by the certification body in the course of performing certification, including granting, maintaining, renewing, extending, suspending and withdrawing of certification;	<b>Similarly addressed in different requirement(s)</b>
	i) The procedure for the recruitment, selection and training of certification body personnel and monitoring of their performance;		• Procedures for the recruitment, selection, training and assignment of the certification body's personnel (as outlined under 2.2.);	<b>Similar requirement.</b> Monitoring of performance is covered by IROCB in 2.2.3.
	j) A list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;			Monitoring of sub-contractors is covered by IROCB in 2.2.6. d. IROCB does not specifically require description procedures to assess, record and

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				monitor competence of subcontractors in quality manual.
	k) Its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken;		• A description of procedures applied by the certification body in the course of performing certification, including granting, maintaining, renewing, extending, suspending and withdrawing of certification;	<b>Similarly addressed in different requirement(s)</b>
	l) The procedures for evaluating products and implementing the certification process, including		• A description of procedures applied by the certification body in the course of performing certification, including granting, maintaining, renewing, extending, suspending and withdrawing of certification;	<b>Similarly addressed</b>
	1) The conditions for issue, retention and withdrawal of certification documents;			
	2) Controls over the use and application of documents employed in the certification of products.			
	m) The policy and procedure for dealing with appeals, complaints and disputes;		• Policy and procedures for appeal against certification decisions and other complaints;	<b>Similar requirement</b>
	n) Its procedures for conducting internal audits, based on the provisions of ISO 10011-1.		• Policy and procedures for reviewing quality (e.g. internal audits, management review).	IROCB does not specifically reference ISO 10011-1 for internal audits.
4.6	<b>Conditions and procedures for granting maintaining, extending, suspending and withdrawing certification</b>	2.5.2.	<b>Management System Manual</b> a. The certification body shall address and document all applicable procedures, either in a manual or in associated documents, in order to ensure uniform and consistent application.	<b>Similarly addressed in different requirement(s)</b>
4.6.1	The certification body shall specify the conditions for granting, maintaining and		b. The manual and associated documents, as appropriate for the type, range and volume of work	

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	<p>extending certification and be conditions under which certification may be suspended or withdrawn, partially or in total. The certification body shall have procedures to</p> <p>a) Grant, maintain, withdraw and if applicable, suspend certification;</p>		<p>performed, and considering the number of personnel involved in the process, shall contain:</p> <ul style="list-style-type: none"> <li>A description of procedures applied by the certification body in the course of performing certification, including granting, maintaining, renewing, extending, suspending and withdrawing of certification;</li> </ul>	
	<p>b) Extend or reduce the scope of certification;</p>	3.4.3	<p><b>Notification of changes made by the operator</b></p> <p>a. The certification body shall require operators to inform the certification body about changes cited in 3.1.2.</p> <p>b. The certification body shall determine whether the announced changes require further investigations. If such is the case, the operator shall not be allowed to release certified products produced under the changed conditions until the certification body has notified the operator accordingly.</p> <p>c. In response to an application for amendment to the scope of a certificate already granted, the certification body shall decide what evaluation procedure, if any, is appropriate, in order to determine whether or not the amendment should be made, and shall act accordingly.</p>	
	<p>c) Re-evaluate, in the event of changes significantly affecting the product's design or specification or changes in the standards to which compliance of the product is certified, or changes in the</p>	3.4.1.	<p><b>Re-evaluation</b></p> <p>a. The certification body shall regularly re-evaluate operators in order to verify whether they continue to comply with the applicable standard. Mechanisms</p>	Similarly addressed

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	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.		shall be in place to effectively monitor whether corrective actions have been implemented.	
4.7	<b>Internal audits and management reviews</b>	2.5.5.	<b>Internal audit and management review</b>	
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. The certification body shall ensure that		The certification body shall demonstrate that it seeks and achieves continuous quality improvement. It shall perform management reviews and internal audits according to the type, range and volume of certification performed.	<b>Similarly addressed in general except for some details below:</b>
	a) Personnel responsible for the area audited are informed of the outcome of the audit;		a. In particular, it shall periodically review all procedures in a planned and systematic manner, to verify that the quality system and its procedures are implemented and effective. Performance reviews conducted periodically shall be part of the review	IROCB does not detail informing personnel responsible of outcome of audit in this section. However, ensuring access to audit outcomes is implied in 2.5.2. c.
	b) Corrective action is taken in a timely and appropriate manner; and			IROCB does not detail requirement for timely and appropriate corrective action to be taken after internal audits.
	c) The results of the audit are documented.			
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 stated quality policy and objectives. Records of such reviews shall be maintained.		b. Review intervals shall be sufficiently short to ensure that the objective of quality improvement is fulfilled. Records of quality reviews shall be maintained.	<b>Similarly addressed</b>

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4.8	<b>Documentation:</b>	2.4.	<b>Access to information</b>	
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:		The certification body shall provide access to information to ensure confidence in the integrity and credibility of its certification. The certification body shall make available (through publications, electronic media or other means) on request:	<b>Similarly addressed in general except for some details below:</b>
	a) Information about the authority under which the certification body operates;			IROCB does not mention this point
	b) A documented statement of its product certification system, including its rules and procedures for granting, maintaining, extending, suspending and withdrawing certification;		a. The standard to be met by operators in order to obtain/maintain certification;	<b>Similarly addressed by different requirement(s)</b>
			b. Information about procedures applied for evaluating whether operators meet the applicable standard;	
			c. Information about procedures applied to cases where certification is extended;	
	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 and general information on the fees charged to applicants and to suppliers of certified products;		d. Information about procedures and sanctions applied where non-conformities with standards are detected;	ISO 65 does not detail documentation requirement on information of procedures and sanctions where non-conformities with standards are detected.
	e) A description of the rights and duties of applicants and suppliers of certified		e. The fee structure for its services;	<b>Not equally addressed</b> IROCB does not detail documenting means by which the certification body obtains financial support.
			f. A description of the rights and duties of operators, including requirements, restrictions or limitations on	<b>Similar requirement</b>

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	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;		the use of any certification logo and on ways of referring to the certification granted;	
	f) Information about procedures for handling complaints, appeals and disputes;		g. Information about procedures for handling general complaints and appeals against its certification decisions; and	<b>Similar requirement</b>
	g) A directory of certified products and their suppliers.		h. A list of certified operations and the scope of their certification.	<b>Similarly addressed</b> ISO 65 does not detail including description of scope of certification in list of certified operations.
4.8.2	The certification body shall establish and maintain procedures to control all documents and data that relate to its certification functions.	2.5.3.	<b>Document control</b> The certification body shall establish and maintain procedures to control its documents that relate to its certification functions. In particular, the certification body	<b>Similar requirement</b>
	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.		a. Shall, through authorized and competent personnel, review and approve documents for adequacy prior to their original issue or any subsequent amendment;	<b>Similar requirement</b>
	A listing of all appropriate documents with the respective issue and/or amendment status identified shall be maintained.		b. Maintain a list of all appropriate documents with the respective issue dates and duly identify their amendment status; and	<b>Similar requirement</b>
	The distribution of all such documents shall be controlled to ensure that the appropriate documentation is made available to personnel of the certification body or		c. Control the distribution of all such documents to ensure that the appropriate documentation is provided to personnel of the certification body or its subcontractors when they are required to perform any	<b>Similarly addressed</b>

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	suppliers when they are required to perform any function relating to the certification body's activities.		function relating to the certification body's activities, and prevent the unintended use of obsolete documents.	
4.9	<b>Records</b>	2.5.4.	<b>Maintaining and managing records</b>	
4.9.1	The certification body shall maintain a record system to suit its particular circumstances and to comply with existing regulations. 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, maintaining, extending, suspending or withdrawing certification.		a. The certification body shall maintain a system of records (either electronic or paper documents) to demonstrate that the certification procedures have been effectively fulfilled, particularly with respect to application forms, evaluation or re-evaluation reports, and other documents relating to granting, maintaining, renewing, extending, suspending or withdrawing certification.	<b>Similar requirement</b>
	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.		b. 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.	<b>Similar requirement</b>
			c. Operator records shall be up to date and contain all relevant information, including inspection reports and certification history.	ISO 65 does not detail maintenance of operator's records.
			d. Records shall also be kept on exceptions granted, appeals and subsequent actions.	ISO address record keeping of appeals and complains in 7.2. a.
	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. <i>Note 4 the question of the length of time for retention of records requires specific attention in the light of legal circumstances</i>		e. Records shall be kept for at least five years, or as required by law, in order to be able to demonstrate how certification procedures have been applied.	<b>Similarly addressed</b> IROCB specified a minimum time period of 5 years. ISO 65 does not specify any minimum time period.

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	<i>and recognition arrangements.</i>			
4.9.2	The certification body shall have a policy and procedures for retaining records for a period consistent with its contractual, legal or other obligations. The certification body shall have a policy and procedures concerning access to these records consistent with 4.10.1			Access to records and safeguarding confidentiality is addressed in 2.4.2 and 2.5.4
4.10	<b>Confidentiality:</b>	2.4.2.	<b>Confidentiality</b>	
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.		In order to gain privileged access to information, the certification body shall make adequate arrangements to safeguard the 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. Arrangements shall	<b>Similar requirement</b>
4.10.2	Except as required in this guide or by law, information gained in the 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.		a. Protect proprietary information of a client against misuse and unauthorized disclosure; and	<b>Not equally addressed</b> IROCB does not detail protecting disclosure of information through requirement for written consent of the operator.
			b. Grant the certification body the right to exchange information with other certification bodies and / or authorities to verify the authenticity of the information.	Besides providing information as required or permitted by law, IROCB also recognise and provide for the need for exchange of information between certification bodies.
5.	<b>Certification body personnel</b>	2.2.	<b>Personnel</b>	

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5.1	<b>General</b>	2.2.1.	<b>General</b>	
5.1.1	The personnel of the certification body shall be competent for the functions they perform, including making required technical judgments, framing policies and implementing them		a) The certification body shall employ sufficient personnel competent to perform certification functions and operate its system.	<b>Similar requirement</b>
5.1.2	Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. These instructions shall be maintained up to date.	2.2.2.	b. The certification body shall maintain up-to-date documents describing the respective responsibilities of assigned personnel.	<b>Similar requirement</b>
5.2	<b>Qualification criteria</b>	2.2.2.	<b>Qualification criteria and documentation</b>	
5.2.1	In order to ensure that evaluation and certification are carried out effectively and uniformly, the minimum relevant criteria for the competence of personnel shall be defined by the certification body.		a. The certification body shall define minimum criteria for the competence of personnel. Criteria should specify minimum education, training, technical knowledge and work experience relevant to the scope of certification issued.	<b>Similar requirement</b>
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	2.2.4.	<b>Assignment of personnel</b> The certification body shall require personnel, including committee members, involved in the certification process to:	<b>Similarly addressed</b>
	a) To comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interest; and		a. Commit themselves to observing the policies and procedures of the certification body;	<b>Similarly addressed</b>
	b) To declare any prior and/or present association on their own part, or on the part of their employer, with a supplier or designed of products to the evaluation or		b. Declare any prior or present association on their own part, or on the part of their employer, with an operator seeking certification to which they are to be	<b>Similar requirement.</b>

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	certification of which they are to be assigned.		assigned to perform certification procedures.	
	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.	2.2.3.	<p><b>Capacity-building</b></p> <p>The certification body shall ensure that personnel involved in certification (i.e. inspectors and other certification personnel, including members of technical committees) have and continue to have up-to-date technical knowledge in their respective fields of activity to enable them to conduct evaluation and certification effectively and uniformly.</p> <p>In particular, the certification body shall</p> <p>a. Review the competence of its personnel in light of their performance in order to identify training needs; and</p> <p>b. Ensure that new personnel have sufficient competence.*</p> <p><i>* Explanatory note: for example, new personnel could be required to complete a training course in conducting organic inspection and evaluation and/or undergo a defined on-site apprenticeship period.</i></p>	<p><b>Similarly addressed by different requirement(s)</b></p> <p>Requirement is about how the certification body ensure and document that personnel satisfy requirements related to personnel qualifications and conflict of interest.</p>
		2.3.2.	<p><b>Management of impartiality</b></p> <p>The certification body shall identify, analyse and document the possibilities for conflicts of interest arising from its provision of certification, including any conflicts arising from its relationships.</p> <p>Rules and procedures shall be established to prevent or minimize threat of conflicts of interest. In particular, the certification body shall</p> <p>a. Require personnel, committee and board members</p>	

Comparison between ISO Guide 65 & IROCB				Comparison Remarks
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			to declare existing or prior association with an operation subject to certification. Where such an association threatens impartiality, the certification body shall exclude the person concerned from work, discussion and decisions at all stages of the certification process related to the potential conflict of interest;	
			b. Follow defined rules for appointing and operating committees involved in certification activities to ensure that decisions taken are not influenced by any commercial, financial and/or other interest.	
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:	2.2.2.	<b>Qualification criteria and documentation</b> b. The certification body shall maintain up-to-date documents describing the respective responsibilities of assigned personnel.	<b>Similarly addressed in general</b> however IROCB does not prescribe what kind of records are required to be documented and kept. See below:
	a) Name and address;			Record detail not prescribed in IROCB
	b) Organization affiliation and position held;			Record detail not prescribed in IROCB
	c) Educational qualification and professional status;			Record detail not prescribed in IROCB
	d) Experience and training in each field of the certification body's competence;			Record detail not prescribed in IROCB
	e) Date of most recent updating of records;			Record detail not prescribed in IROCB
	f) Performance appraisal.			Record detail not prescribed in IROCB ISO requirement is not about performance

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				appraisal but recording of performance appraisal.	
6	<b>Changes in the certification requirements</b>	3.4.4.	<b>Changes in the certification requirements</b>		
	The certification body shall give due notice of any changes it intends to make in its requirements for certification. It shall take account of views expressed by interested parties before deciding on the precise form and effective date of the changes.		a. The certification body shall ensure that each operator is notified of any changes in the certification requirements without unnecessary delay.	<b>Not equally addressed</b> IROCB does not specifically require views of interested parties to be taken into account before deciding the precise form and date of the changes.	
	Following decision on, and publication of, the changes requirements, it shall verify that each supplier makes any necessary adjustments within such time as, in the opinion of the certification body, is reasonable.		b. The certification body shall verify the operator's implementation of such changes in a timely manner, within the given implementation periods.	<b>Similarly addressed</b>	
7	<b>Appeals, complaints and disputes</b>	2.5.6.	<b>Appeals and complaints</b>		
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.		The certification body shall have in place policies and procedures for the resolution of complaints and appeals received from operators or other parties about the handling of certification or any other related matters. In particular, the certification body shall	<b>Similarly addressed</b>	
7.2	Each certification body shall		<b>2.5.4. Maintaining and managing records</b>	<b>2.5.4. Maintaining and managing records</b> d. Records shall also be kept on exceptions granted, appeals and subsequent actions.	<b>Similarly addressed by different requirement(s)</b> record keeping is addressed in 2.5.4. d.
	a) Keep a record of all appeals, complaints and disputes and remedial actions relative to certification;		a. Take appropriate subsequent action to resolve complaints and appeals; and	<b>Similar requirement</b>	
	b) Take appropriate subsequent action;		b. Document the action taken and its effect.	<b>Similar requirement</b>	
	c) Document the action taken and its				

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	effectiveness.			
8	<b>Application for certification</b>	3.	<b>Process requirements for conducting organic certification</b>	
8.1	<b>Information on the procedure</b>	3.1.	<b>Application procedures</b>	
8.1.1	The certification body shall provide to application an up-to-date detailed description of the evolution 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).	3.1.1.	<b>Information for operators</b> The certification body shall provide to operators an up-to-date description of the procedures to be applied for conducting certification. The certification body shall inform operators about	<b>Similarly addressed</b> IROCB has more prescriptive details of information to be shared.
			a. Contractual conditions, including fees and possible contractual penalties;	Covered under 8.1.1 of ISO 65
			b. The operator's rights and duties, including the appeals procedure;	Covered under 8.1.1 of ISO 65
			c. The applicable standards;	Covered under 8.1.1 of ISO 65
			d. Program changes, including regular updates of procedures and standards;	Covered under 6 of ISO 65
			e. The evaluation and inspection procedures applied by the certification body in the course of certification; and	Covered under 8.1.1 of ISO 65
			f. Documentation to be maintained by the operator to enable verification of compliance with applicable standards by the certification body.	Not mentioned in the ISO guide 65
8.1.2	<b>The certification body shall require that a supplier</b>	2.1.2.	<b>Certification agreement</b> The certification body shall provide its certification service based on an agreement signed by the applicants and operators. In particular, the agreement shall	<b>Similarly addressed in general but not equal in details.</b> ISO 65 prescribes a more detailed list of conditions.
	a) Always complies with the relevant provisions of the certification programme;			

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	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;		a. Include a description of the rights and duties of the applicants and operators offering certified products, including a commitment to comply with the relevant provisions of the certification program;	
	c) Makes claims regarding certification only in respect of the scope for which certification has been granted;		b. Specify requirements, restrictions or limitations on the use of the designated certification logo and on the ways of referring to the certification granted in order to prevent misleading use or claims;	
	d) 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;			
	e) Upon suspension or cancellation of certification, discontinues its uses of all advertising matter that contains any reference there to and returns any certification documents as required by the certification body;			
	f) Uses certification only to indicate that products are certified as being in conformity with specified standards;			
	g) Endeavors to ensure that no certificated or report nor any part thereof is used in a			

<b>Comparison between ISO Guide 65 &amp; IROCB</b>				<b>Comparison Remarks</b>
<b>General requirement for bodies operating product certification systems</b>		<b>International Requirements for Organic Certification Bodies</b>		
<b>Clause No.</b>	<b>ISO 65</b>	<b>Clause No.</b>	<b>IROCB</b>	
	misleading manner; h) In making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of the certification body.			
8.1.3	When the desired scope of certification is related to a specific system or type of system operated by the certification body, and explanation needed shall be provided to the applicant.	<b>3.1.1.</b>	<b>Information for operators</b> The certification body shall provide to operators an up-to-date description of the procedures to be applied for conducting certification.	<b>Similarly addressed by different requirement(s)</b>
8.1.4	If requested, additional application information shall be provided to the applicant.			
8.2	<b>The application</b>	3.1.2.	<b>Application form and the operator's obligations</b>	
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;		The certification body shall require completion of an application form, signed by a duly authorized representative of the operator. To enable evaluation and assignment of qualified personnel, the certification body shall require operators to:	<b>Similar requirement</b>
	a) The scope of the desired certification;		a. Provide information about the scope of the desired certification, including a description, as specified by the certification body, of the production, products and area to be certified; and b. Provide information as to whether another certification body has denied certification.	<b>Similarly addressed</b> IROCB elaborates further details to be provided by the applicant, including information about previous certification.
	b) A statement that the applicant agrees to comply with the requirements for certification and to supply any	<b>2.1.2.</b>	<b>Certification agreement</b> The certification body shall provide its certification service based on an agreement signed by the	<b>Similarly addressed by different requirement(s)</b> Statement to comply is addressed by IROCB

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	information needed for evaluation of products to be certified.		applicants and operators. In particular, the agreement shall a. Include a description of the rights and duties of the applicants and operators offering certified products, including a commitment to comply with the relevant provisions of the certification program;	in certification agreement.
8.2.2	The applicant, as a minimum, shall provide the following information;			IROCB does not specify minimum application information.
	a) Corporate entity, name, address and legal status;			
	b) A definition of the products to be certified, the certification system, and the standards against which each product is to be certified if known to the applicant.	3.1.2.	<b>Application form and the operator's obligations</b> a. Provide information about the scope of the desired certification, including a description, as specified by the certification body, of the production, products and area to be certified; and	<b>Similarly addressed.</b>
9	<b>Preparation for evaluation</b>	3.2.2.	<b>Review of application and preparation of inspection</b>	
9.1	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 requirement for certification are clearly defined, documented and understood;		a) Prior to the inspection, the certification body shall review the application documents to ensure that certification can be carried out and that application of certification procedures is possible.  In particular, the certification body shall review whether	<b>Similarly addressed</b>
			• Documents submitted by the operator are complete;	ISO guide 65 does not detail checking completion of application.
	b) Any difference in understanding between the certification body and the		• The operator appears to be able to comply with all certification requirements (applicable procedures and	<b>Similarly addressed</b>

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	applicant is resolved; and		standards);	
	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.		<ul style="list-style-type: none"> <li>The scope of the certification sought is within the scope of the certification services provided. (New scope could also be a new geographical area where the certification body is not yet active.)</li> </ul>	<b>Similarly addressed</b>
9.2	The certification body shall prepare a plan for its evaluation activities to allow for the necessary arrangements to be managed.		c) The certification body shall inform inspectors about any non-conformities and the associated requests for corrective action issued previously, to enable the inspectors to verify whether the non-conformities have been resolved.	<b>Similarly addressed by different requirement(s).</b>
9.3	The certification body shall assign personnel appropriately qualified to perform the tasks for the specific evaluation. 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.		b) The certification body shall assign qualified personnel to the evaluation in line with the requirements of 2.2 and 2.3 above, and provide them with appropriate work-related documents.	<b>Similarly addressed.</b>
9.4	To ensure that a comprehensive and correct evaluation is carried out, the personnel involved shall be provided with the appropriate working documents.			
		3.2.3.	<b>Inspection protocol</b>	
			Inspection is carried out in order to verify information and compliance with certification requirements applicable to the operator. It shall	The inspection protocol in IROCB document enlists the critical checks to be carried out during inspection, which will be very useful

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			follow a set protocol to facilitate non-discriminatory and objective inspection. The inspection protocol shall at the very minimum undertake the following:	for the certification bodies. This is not covered under the ISO guide 65 document.
			a. Assessment of the production or processing system by means of visits to facilities, fields and storage units (which may also include visits to non-organic areas if there is reason for doing so);	
			b. Review of records and accounts in order to verify flow of goods (production/sales reconciliation on farms, input/output reconciliation and the tracing back of audits in processing and handling facilities);	
			c. Identification of areas of risk to organic integrity;	
			d. Verification that changes to the standards and to requirements of the certification body have been effectively implemented; and	
			e. Verification that corrective actions have been taken.	
		3.2.4.	<b>Particular requirements to address high-risk situations</b>	This is not covered under ISO guide 65
			The certification body shall amend and adapt its certification procedures to address higher risks found in certain situations specific to organic certification. Potential high-risk situations and related measures include:	
			a. Partial conversion and parallel production. In order to prevent co-mingling or contamination of organic products with other products that do not meet the	Guidelines on partial and parallel conversion are specific to organic product certification system, which have not been covered by ISO

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			standards, the certification body should verify whether handling and documentation regarding production or processing, storage and sales is well managed and makes clear distinctions between certified and non-certified products. In cases where products are not visibly distinguishable, specified measures should be applied during harvest and post-harvest handling to reduce the risk.	Guide 65.
			b. Intensive production and high dependence of external inputs, short production cycles. Depending on the risk identified, the certification body should decide whether it is appropriate to increase the frequency of inspections.	
			c. Where an operator is certified also by other certification bodies within the same organic scope, the certification body should seek information exchange with the other certification bodies involved to prevent misuse of certificates.	
		3.2.5.	<p><b>Requirements for group certification systems</b></p> <p>a. If the certification body conducts group certification based on an internal quality management system, it should apply a specific group certification program.</p> <p>b. The group certification program should specify the scope for group certification and requirements applicable to the group, including those for an internal quality management system, to ensure conformity by all group members to the applicable standards. These should follow an agreed code of good practices.</p> <p>c. When assessing the effective application of the</p>	Grower group certification is specific to organic sector requirement. Hence not covered under ISO guide 65.

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			internal quality management system to address the particular situation of group certification, the certification body should apply adapted measures to the regular on-site inspection protocol according to an agreed code of good practices.	
10	<b>Evaluation</b>	3.2.	<b>Evaluation</b>	
	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.	3.2.1.	<b>Scope</b> a. The certification body shall evaluate operators against all certification requirements specified. The evaluation shall consist of a review of documents and an on-site inspection visit.	<b>Similar requirement</b>
		b. When the scope of certification is for labelling of conversion to organic, verification of compliance with these requirements shall take place during the conversion period.		This point is specific to organic sector. Hence not covered under ISO 65.
11	<b>Evaluation report</b> The certification body shall adopt reporting procedures that suit its needs but, as minimum, these procedures shall ensure that	3.2.6.	<b>Reporting</b> The certification body shall report evaluation findings according to documented reporting procedures.	<b>Similarly addressed</b> The certification body, the term used for the responsible body can also mean assigned staff or contract workers. <b>Difference in terminology:</b> ISO guide 65 used “Evaluation Report” whereas IROCB refers to it as “Inspection Reports”. It may be helpful to standardize the terminology used in reference documents.
	a) Personnel appointed to evaluate the conformance of the products shall provide the certification body with a report of finding as to the conformity with all the certification requirements;		a. Inspection reports shall follow a format appropriate to the type of operation inspected, and facilitate a non-discriminatory, objective and comprehensive analysis of the respective production system.	<b>Similarly addressed</b> IROCB further elaborates details to be included in inspection report. See below.
			b. The inspection report shall cover all relevant	

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			<p>aspects of the standards, and adequately validate the information provided by the operator. It shall include</p> <ul style="list-style-type: none"> <li>• A statement of any observations relating to conformity with the certification requirements;</li> <li>• Date and duration of the inspection, persons interviewed, fields and facilities visited; and</li> <li>• Type of documents reviewed.</li> </ul>	
	<p>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 extend of further evaluation or testing required.</p>		<p>c. The certification body shall promptly notify the operator of any non-conformity to be resolved in order to comply with applicable certification requirements.</p>	<p><b>Similarly addressed.</b> ISO65 additionally mentions informing applicant of further evaluation or testing if required.</p>
	<p>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.</p>		<p>d. The certification body shall document and apply measures to verify effectiveness of corrective actions taken by operators to meet the requirements.</p>	<p><b>Similarly addressed</b></p>
12	<b>Decision on certification</b>	3.3.	<b>Decision on certification</b>	
12.1	<p>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.</p>	3.3.2.	<p><b>Basis for the decision</b> The decision shall be based solely on the conformity of the operation with the certification requirements specified, using information gathered during the evaluation process.</p>	<p><b>Similarly addressed</b></p>
	<p>The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing</p>	<b>2.1.3.</b>	<p><b>Responsibility for certification decisions</b> a. The certification body shall have final responsibility for granting, maintaining, extending,</p>	<p><b>Similarly addressed</b></p>

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	certification to an outside person of body.		suspending and withdrawing certification.	
	The certification body shall provide to each supplier offering certified product, 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:	3.3.6.	<b>Issuing of certification documents</b> The certification body shall issue official certification documents to each operator. Documents shall contain the following information:	<b>Similarly addressed</b>
	a) The name and address of the supplier whose products are the subject of certification;		a. The name and address of the operator whose products are the subject of certification;	<b>Similar requirement</b>
			b. Name and address of the certification body that issued the certification documents;	ISO guide 65 does not mention this requirement.
	b) The scope of the certification granted, including, as appropriate,		c. The scope of the certification granted, including	<b>Similar requirement</b>
	1) The products certified, which may be identified by type or range of products;		• The products certified, which may be identified by type or range of products,	<b>Similar requirement</b>
	2) The product standards or other normative documents to which each product or product type is certified;		• The production standard that is the basis for the certification, and	<b>Similar requirement</b>
	3) The applicable certification system;			<b>Not relevant</b> IROCB is specific to organic certification system.
	c) The effective date of certification, and the term of the certification if applicable.		• The effective date and term of certification.	<b>Similar requirement</b>
	In response to an application for amendment	3.4.3.	<b>Notifications of changes made by the operator</b>	<b>Similar requirement</b>

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	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.		c. In response to an application for amendment to the scope of a certificate already granted, the certification body shall decide what evaluation procedure, if any, is appropriate, in order to determine whether or not the amendment should be made, and shall act accordingly.	
			<b>Documentation</b> Documentation of certification decisions shall include the basis for the decisions.	Documentation of certification decisions is not separately mentioned in ISO guide 65. However, covered under section 4.9.1 on "Records".
		3.3.4.	<b>Dealing with non-conformities</b> a. Certification decisions may include requests for the correction of minor non-conformities within a specified time period. In case of major non-conformities, a certificate shall be withheld or suspended until implementation of corrective actions can be demonstrated. In serious cases, certification shall be denied or withdrawn.	ISO guide 65 document does not specify guidelines to deal with non-conformities and reasons to withheld, suspend, deny or withdraw certification.
			b. Reasons for denial, withdrawal or suspension of certification shall be stated with clear reference to the applicable standard or certification requirement violated.	Not covered under ISO Guide 65
		3.3.5.	<b>Exceptions to certification requirements</b>	
			a. The certification body shall have clear criteria and procedures for granting exceptions to requirements for certification.	Exceptions not covered under ISO Guide 65. Provisions for exceptions may be considered in the next revision of ISO guide 65.
			b. Exceptions shall be of limited duration, and not be granted permanently.	
			c. The documentation of any exception shall include	

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			the basis on which the exception is granted.	
13	<b>Surveillance</b>	3.4.	<b>Extension and renewal of certification</b>	
13.1	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.	3.4.1.	<p><b>Re-evaluation</b></p> <p>a. The certification body shall regularly re-evaluate operators in order to verify whether they continue to comply with the applicable standard. Mechanisms shall be in place to effectively monitor whether corrective actions have been implemented.</p> <p>c. Re-evaluation generally follows procedures outlined in 3.2. (i.e. Evaluation). However evaluation for the purpose of renewal may focus on certain measures related to risk, and might not repeat all procedures listed in 3.2.</p>	<p><b>Similarly addressed in principle</b></p> <p>IROCB set clearer requirements for organic sector.</p> <p>ISO and IROCB use different terminology</p> <p><b>Surveillance:</b> Term used for periodic evaluation of the operations to verify compliance to applicable standards and certification system.</p> <p><b>Re-evaluation:</b> Term used for evaluating the operations for a second time to verify compliance to applicable standards and certification system.</p> <p>It may be helpful to standardize the terminology used in reference documents.</p>
		3.4.2.	<b>Frequency of inspection</b>	
			a. The certification body shall decide on the frequency for regular inspections.	ISO guide 65 does not mention anything about “Frequency of Inspections”.
			b. In addition to the regular inspection visit, the certification body shall conduct unannounced on-site inspections of certified operators, chosen randomly and/or chosen taking into account the risk or threat to the organic integrity of the production or products.	ISO guide 65 does not cover the clause of unannounced inspections.
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,	3.4.3.	<p><b>Notification of changes made by the operator</b></p> <p>a. The certification body shall require operators to inform the certification body about changes cited in 3.1.2.</p>	<b>Similarly addressed</b>

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	which affect the conformity of the product.			
	The certification body shall determine whether the announced changes require further investigations. If such is the case, the supplier shall not be allowed to release certified products resulting from such changes until the certification body has notified the supplier accordingly.		b. The certification body shall determine whether the announced changes require further investigations. If such is the case, the operator shall not be allowed to release certified products produced under the changed conditions until the certification body has notified the operator accordingly.	<b>Similar requirement</b>
13.3	The certification body shall document its surveillance activities.	3.4.1.	<b>Re-evaluation</b> b. The certification body shall report and document its re-evaluation activities, and shall keep operators informed about their certification status.	<b>Similarly addressed</b>
13.4	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.	1.2.1	<b>Evaluation methods</b> Evaluation methods shall consist of document review, appraisal of quality management systems and on-site inspection visits. Sample analyses and testing should serve as supporting tools to verify information.	<b>Similarly addressed.</b> Sample analysis and testing are supporting tools for organic certification.
14	<b>Use of license, certificates and marks of conformity</b>	2.4.3.	<b>Reference to certification and use of certification logo (mark)</b> The certification body shall	
14.1	The certification body shall exercise proper control over ownership, use and display of licenses, certificates and marks of conformity.		a. Exercise control over ownership, use and display of licenses, certificates and logos that it can authorize certified operators to use. b. Be able to request an operator to discontinue use of certificates and logos that it authorizes certified operators to use.	<b>Similarly addressed</b>
14.2	Guidance on the use of certificates and marks permitted by the certification body		c. Apply suitable actions to deal with incorrect references to the certification system or misleading	<b>Similarly addressed</b> IROCB does not reference ISO/IEC guide 23

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	may be obtained from ISO/IEC Guide 23.		use of licenses, certificates or logos that it authorizes certified operators to use.	for guidance on the use of certifications and marks nor reference ISO/IEC Guide 27 for guidance on suitable actions in case of incorrect references to the certification system and misleading use of licenses, certificates or logos.
14.3	<p>Incorrect references to the certification system or misleading use of licenses, certificates or marks, found in advertisements, catalogues, etc., shall be dealt with by suitable action.</p> <p><i>Note: 5 such actions are addressed in ISO/IEC Guide 27 and can include corrective action, withdrawal of certificate, publication of the transgression and, if necessary, other legal action.</i></p>			
15	<p><b>Complaints to suppliers</b></p> <p>The certification body shall require the supplier of certified products to</p>			IROCB does not cover the clause of “ <b>Complaints to suppliers</b> ”
	a) Keep a record of all complaints made known to the supplier relating to product’s compliance with requirements of the relevant standard and to make these records available to the certification body when requested;			IROCB document does not provide guidelines for suppliers / operators to keep record of all complaints relating to products compliance with requirements of the relevant standard and to make these records available to the certification body when required.
	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			Not covered under IROCB
	c) Document the action taken.			Not covered under IROCB