



Certification Manual

Organic Plus Trust ©

Grass-Fed Organic Livestock Program

Administered by Earth Claims LLC

107 S. West Street

Alexandria, VA 22314

phone 202.596.5592 | fax 202.449.8316

web www.earthclaims.com | email info@earthclaims.com

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INTRODUCTION

PCO is accredited to offer certification to The Organic Plus Trust's Certified Grass-Fed Livestock Program. The Organic Plus Trust's Certified Grass-Fed Livestock Program is an optional additional certification scope for operations that are certified organic under the USDA National Organic Program regulations. The program standards and policy manual apply to producers of ruminant livestock and to handlers of meat and dairy products derived from ruminant livestock.

PCO worked in collaboration with Organic Valley, Maple Hill Creamery and NOFA-NY on the development of harmonized grass-fed standards with the hope that consistency across certifiers will promote consumer confidence in grass-fed products, providing additional market opportunities for our grass-fed clients. The project started from the existing 100% Grass-Fed Programs administered by PCO and NOFA-NY. Additional stakeholders consulted include farmers, grazing specialists, handlers and marketers.

PCO's Mission, Vision, and Values

Our vision, mission, and values serve as a guide for what and how PCO works and makes decisions every day. Through our vision we strive so that: all communities are enriched through organic food and farming. We are on a mission to ensure the integrity of organic products and serve our farming community. Our Values recognize the interdependent relationships between all of our stakeholders: Certified Clients & Members, Employees & Contractors, Partner Organizations, and the Community and Environment.

PCO Core Values:

1. Keep people at the center of every action, interaction, and decision.
2. Promote restorative practices that improve the world for future generations.
3. Embrace transparency and integrity in all our work.

QUESTIONS AND ANSWERS

- **Who is eligible to apply for the Certified Grass-Fed Organic Livestock Program?**
Operations currently certified or applying for organic certification under the USDA National Organic Program.
- **What types of operations can be certified under the Certified Grass-Fed Organic Livestock Program?**
All producers of ruminant livestock and handlers of meat and dairy products derived from ruminants.
- **Will my operation need to be inspected in order to be certified under the Certified Grass-Fed Organic Livestock Program?**
Yes. An on-site inspection to verify that your operation meets the Certified Grass-Fed Organic Livestock Program standards will be conducted annually. Operations that are certified organic by PCO may have their grass-fed inspection conducted in conjunction with their organic inspection.

- **How much will it cost?**

You will be charged an additional certification program fee annually, along with the additional time the inspector will spend during your organic inspection to verify that your operation meets the requirements of the Certified Grass-Fed Organic Livestock Program. See current PCO OPT Grass-fed Certification Fee Schedule.

Handlers selling more than \$15,000 of combined products certified to this program's standard will also be assessed a seal usage fee (licensing fee) directly from Organic Plus Trust through Earth Claims LLC.

- **How do I apply?**

Contact PCO to request an application form specific to your type of operation. Submit the completed form, along with the certification fee, to PCO.

- **Once I am certified, how often do I need to renew my certification?**

In order to maintain your certification, it must be renewed annually as part of your annual organic update submission. The renewal process includes updating PCO of changes to your Organic Plus Trust Certified Grass-Fed Organic Livestock Program System Plan and paying the annual certification fee.

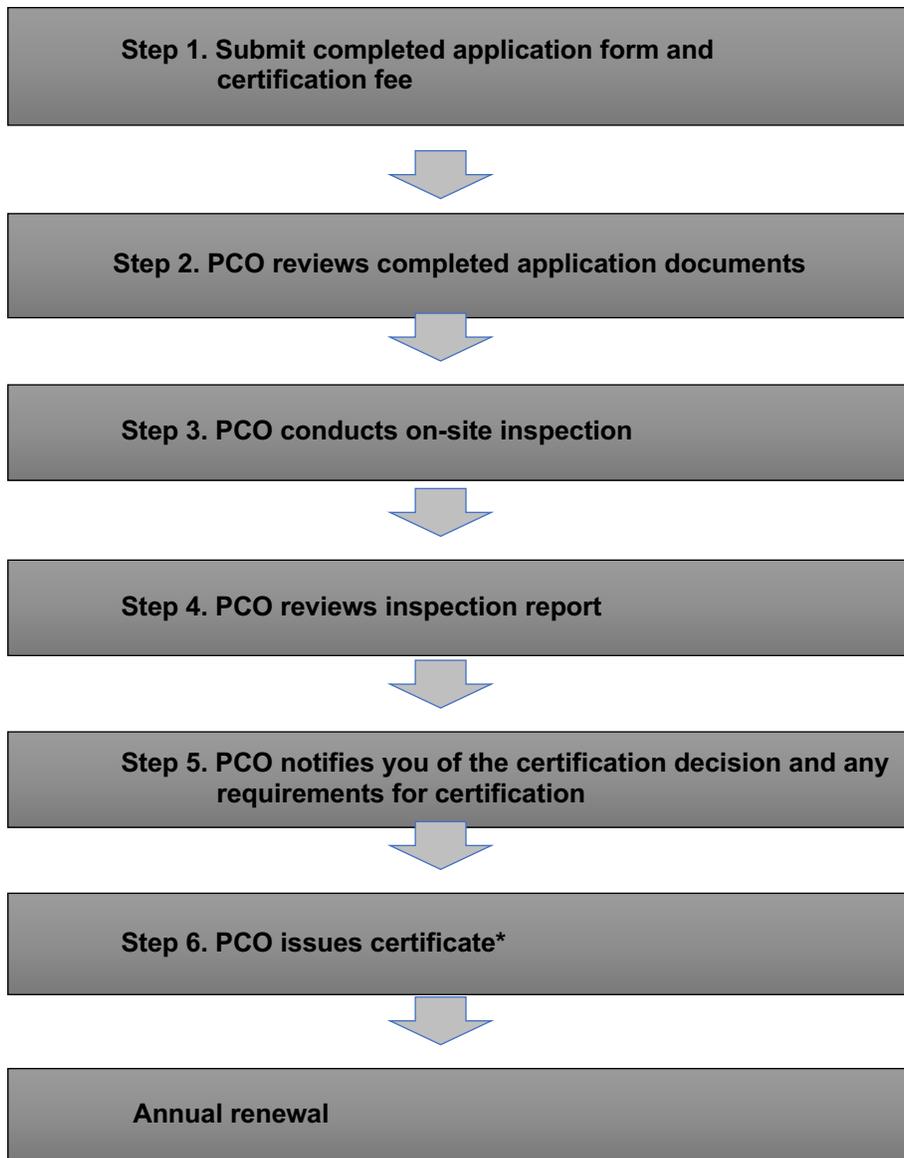
- **What happens if my operation does not comply with the Certified Grass-Fed Organic Livestock Program Standards or certification program requirements?**

If your operation is not in compliance you will be given an opportunity to correct the noncompliance. If correction of the noncompliance is not possible, your application for certification will be denied, or your certification may be suspended or revoked. Operations are given the opportunity to appeal PCO's noncompliance decisions according to PCO's appeals process (see appeals policy below). Operators certified under the Certified Grass-Fed Organic Livestock Program must first comply with all the requirements of the USDA's National Organic Program in order to be considered compliant under the Certified Grass-Fed Organic Livestock Program.

- **What are the benefits of becoming certified under the Certified Grass-Fed Organic Livestock Program?**

Successful completion of the certification process means that your operation has been inspected and verified by PCO, an independent third-party certification agency, to meet the requirements of the Certified Grass-Fed Organic Livestock Program. Your certified product can claim that it is certified under the Certified Grass-Fed Organic Livestock Program, and you may also use the Certified Grass-Fed Organic Livestock Program seal on certified product labeling and marketing materials.

STEPS TO CERTIFICATION



*For handlers only, following Step 6 PCO will notify Earth Claims LLC of certificate issuance. Earth Claims staff will administrate the seal licensing process. All questions related to licensing agreements should be addressed directly to Earth Claims LLC.

CERTIFICATION PROGRAM POLICIES

- **Eligibility**

Operations that are currently certified or applying for organic certification by PCO or another USDA-accredited certification agency under the USDA National Organic Program are eligible to apply to the Certified Grass-Fed Organic Livestock Program. Producers of ruminant livestock and handlers of meat and dairy products derived from ruminants are eligible for certification.
- **Application**

To apply for certification, operations must complete the Organic Plus Trust Certified Grass-Fed Organic Livestock Program System Plan and submit applicable fees and additional documentation as requested by PCO.
- **Initial Review**

PCO shall conduct an initial review of application documentation submitted by operations requesting certification. The purpose of the initial review is to ensure that the information provided is sufficient to determine the applicant's ability to comply with the applicable standards and that the applicant appears to be able to comply with the applicable standards. PCO shall maintain documentation of the initial review. Applicants that do not appear to have the ability to comply will be denied certification.
- **On-Site Inspection Timing and Frequency**

PCO shall conduct an initial on-site inspection of each operation for which certification is requested. The initial inspection is conducted following PCO's determination that the applicant appears to comply or may be able to comply with applicable standards and policies. Following certification, an on-site inspection must continue to occur annually thereafter. Operations that are certified organic by PCO may have their Certified Grass-Fed Organic Livestock Program inspection conducted in conjunction with their organic inspection.
- **Certification Decision**

Upon completion of the initial on-site inspection, PCO shall review the inspection findings for compliance with applicable standards and policies. Noncompliances shall be responded to according to PCO's compliance policy (see separate policy). If the operation is found to be in compliance, or is in compliance once all identified noncompliances have been corrected, PCO shall issue a certificate to the operation attesting that the operation has been verified to be in compliance with the Certified Grass-Fed Organic Livestock Program. Products must not be sold, labeled or represented as certified to this program until certification is issued.
- **Renewal**

In order to maintain certification, operations must renew certification with PCO annually. The renewal process includes updating PCO of any changes to the Organic Plus Trust Certified Grass-Fed Organic Livestock Program System Plan and submitting applicable fees. Failure to comply with renewal requirements and deadlines may result in a noncompliance. Operations that are certified

organic by PCO may complete the renewal process in conjunction with their organic certification annual update.

- **Compliance**

Operations certified to the Certified Grass-Fed Organic Livestock Program Standards must comply with all provisions within the standards, the Organic Plus Trust Grass-Fed Organic Livestock Program Policy Manual and PCO policy. If PCO has reason to believe, based on the on-site inspection and a review of the information provided by the operator, that an operation is not able to comply or is not in compliance the standards or policies, PCO shall provide written notification of noncompliance to the operation. When the operation demonstrates that each noncompliance has been resolved, PCO will send the operation a written notification of noncompliance resolution. When correction of a noncompliance is not possible, PCO may issue a denial of certification to an applicant, or may issue a proposed suspension or revocation to an existing certified operation. If the certified operation fails to correct the noncompliance or resolve the issue through appeal, PCO shall send the certified operation a written notification of suspension or revocation.

- **Appeals**

Operators may file an appeal of a noncompliance or adverse action decision within the time period provided in the decision notification or within 30 days from receipt of the decision notification, whichever occurs later. Appeals must be made to PCO in writing and must include a copy of the adverse decision and statement of the appellant's reasons for believing that the decision was not proper or not made in accordance with applicable standards, policies, or procedures. PCO will consider the appeal in a timely manner, and inform the operation of the decision to sustain or deny the appeal. Decisions of PCO are final and binding.

- **Confidentiality and Information Disclosure**

PCO maintains strict confidentiality with respect to its clients under the Certified Grass-Fed Organic Livestock Program and does not disclose to third parties (with the exception of third parties as required by law (e.g. subpoena)) or by our accrediting body any business-related information concerning any client obtained while implementing the Certified Grass-Fed Organic Livestock Program. PCO will make the following information available to any member of the public:

- a) Certification certificates issued to operations during the current and 3 preceding calendar years.
- b) A list of producers and handlers whose operations it has certified, including the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years.
- c) Other business information as permitted in writing by the client.

- **Standards of Conduct**

Pennsylvania Certified Organic (PCO) strives to provide professional, cost-effective service to its clients. Accordingly, pursuant to this policy, both clients and PCO representatives are expected to maintain a professional and business-appropriate standard of conduct. Although there is no possible way to identify every rule of conduct subject to this policy, the following is an illustrative list. PCO does not intend this list to be comprehensive or to limit PCO's right to take action deemed appropriate by PCO in response to any other conduct it deems inappropriate. Engaging in any conduct PCO deems unprofessional or inappropriate may result in any disciplinary or other action PCO deems appropriate under the circumstances, including but not limited to termination, finding of

non-compliance, discontinuance of service, or rejection of an application. The following are examples of conduct that may be considered a violation of this policy:

- Use of threatening, vulgar or abusive language and/or inappropriate advances of a sexual or other nature directed to any representative of PCO or a client of PCO;
- Dishonesty or falsification of any records supplied to PCO;
- Unauthorized use or possession of PCO property;
- Engaging in any criminal activity;
- Sexual or other illegal harassment or discrimination; and/or
- Violation of any other PCO policy.

As the inspection and certification environment constitute a workplace, safe workplace guidelines and statutes apply to all involved.