True Friends of
Natural and Organic
Cosmetics

NATRUE Requirements for Certification Bodies

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Organic Cosmetics Association

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1. Objective of this Manual

This document specifies the approval and monitoring procedures and sets out the requirements for Certification Bodies to achieve and maintain approval to perform certification according to the NATRUE Label scheme and to implement its related quality assurance system.

2. Principles

The main accreditation partner for the NATRUE Accreditation Programme is IOAS – International Organic Accreditation Service, since it specializes in organic accreditation and operates worldwide. The cooperation is based on a corresponding agreement concluded between NATRUE and IOAS. However, NATRUE reserves the right to establish cooperation with other accreditation partners, if in line with the overall strategy of NATRUE. In this event NATRUE will apply the same requirements on all accreditation partners.

The requirements in this document are based on the IROCB - International Requirements for Organic Certification Bodies released in October 2008 by the International Task Force on Harmonization and Equivalence in Organic Agriculture (ITF) convened by the United Nations Conference on Trade and Development (UNCTAD), the International Federation of Organic Agriculture Movements (IFOAM) and the Food and Agriculture Organization of the United Nations (FAO).

IROCB is based upon the requirements in ISO/IEC Guide 65: 1996 “General requirements for bodies operating product certification systems.” However, 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.

Nevertheless, considering that certification according to the NATRUE Label scheme has certain characteristics that may differ from certification of products and services covered by the ISO/IEC Guide 65 (e.g. inclusion on assessment of management system like environmental management and minimum social criteria) and IROCB (which is mainly developed for organic food products) it also includes sector- and NATRUE specific requirements.

3. Requirements for Accreditation Bodies

Accreditation bodies must comply with the requirements of ISO/IEC Guide 17011, General requirements for assessment and accreditation of certification/registration bodies, and any subsequent revisions and are expected to follow the procedures and requirements as detailed in this manual:

Accreditation Procedure shall include the following as a minimum:

- Review of the applicant Certification Body procedure and documentation
- Audit to the headquarter or main office of the Applicant Certification Body
- Witness audit of a representative manufacturing plant
- Ongoing monitoring of the Accredited Certification Body, including at least one up to date accreditation visit every second year to an office conducting NATRUE Label Certification and at least one witness audit or review audit every second year
- Check of at least 1,5 % (minimum 5) files of certified products on each up to date accreditation visit

4. Scope

The procedures and requirement as outlined in this document are applicable for all applying Certification Bodies as well as for already NATRUE Approved Certification Bodies. Approval shall be granted for certification of finished products (Natural Cosmetics, Natural Cosmetics with Organic Portion, Organic Cosmetics) as well as raw materials (Natural Ingredients, Derived Natural Ingredients) as defined in the latest version of the NATRUE Criteria. Specific programs, like the NATRUE Formula Approval are also covered by these procedures unless different conditions apply.

5. Approval and Monitoring Procedure

5.1. Application Procedure

Applications for approval should be sent to NATRUE AISBL – 40, Rue Washington 4, 1050 Ixelles, Brussels – Belgium to the kind attention of the NATRUE Label Manager, or via mail to ilmc@natrue.eu

Application will be considered only if they contain:

- Duly completed application form
- Legal name and status, address and legal representative of applicant
- List of all offices and branches
- A summary of the relevant professional qualifications and experience of the applicants designed personnel for the NATRUE Label scheme
- Declaration that, if accredited, the applicant agrees to:
    - Operate in compliance with this document
    - Enter into a formal contract with NATRUE (Commitment Declaration) and commit to the specified Fees
    - Attend the most recent NATRUE Criteria Explanatory Session and commit to the specified Fee

After acceptance of the application by NATRUE, the Certification Body must apply to the accreditation body for further accreditation procedure.

5.2 Approval Procedure

The Accreditation body decides if accreditation to the NATRUE Label scheme based on procedures and requirements of this document will be granted to the Certification Body.

6. General requirements

6.1. Responsibility

6.1.1. Legal structure

The structure of the certification body shall foster confidence in its certification operations. In particular, the certification body shall:

a. Have documents attesting to its status as a legal entity;
b. Have documented the rights and responsibilities relevant to its certification activities;
c. Identify the management (body, group or person) that has overall responsibility for the functioning of the certification body, including its finances.

6.1.2. Certification agreement

The certification body shall provide its certification service based on an agreement signed by the 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;
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 by providing the applicant with the latest version of the Agreement on the Usage of the NATRUE Label and its Annexes;
c. Contain provisions to allow the certification body to exchange information with NATRUE, 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.

6.1.3. Responsibility for certification decisions

The certification body shall have final responsibility for granting, maintaining, extending, suspending and withdrawing certification.

6.1.4. Acceptance of prior certification

Where Raw Materials in the production chain have been certified by other certification bodies according to the NATRUE Criteria, the certification body accept prior certification.

6.2. Personnel

6.2.1. General

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. Knowledge in the following areas is necessary to perform the NATRUE Certification:

- Chemistry and/or Cosmetics
- Raw materials expertise
- EU cosmetics legislation and EU eco Regulation
- Manufacturing processes
- Audit experience related to DIN ISO 9001:2000 or a similar QM system
- GMP expertise

c. The certification body shall maintain up-to-date records on personnel.

6.2.2. Qualification criteria and documentation

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 in particular:
    - a university degree in the field of cosmetics, chemistry or related subject plus expertise in quality management system;
    - or, at least 3 years in professional experience in the cosmetic industry or similar field plus expertise in quality management system;
    - or, at least 2 years professional experience in inspection and certification of cosmetic or organic products.
b. The certification body shall maintain up-to-date documents describing the respective responsibilities of assigned personnel.

6.2.3. Capacity-building

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;

b. Ensure that new personnel have sufficient competence by guaranteeing their participation at the most recent NATRUE Criteria Explanatory Session.

6.2.4. Assignment of personnel

The certification body shall require personnel, including committee members, involved in the certification process to:

a. Commit themselves to observing the policies and procedures of the certification body;
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 assigned to perform certification procedures.

6.2.5. Assignment of committees

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 6.2.1 and 6.2.2.

6.2.6. Subcontracting (outsourcing)

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 up.

The certification body shall:

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).
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.

6.3. Impartiality and objectivity

6.3.1. Organizational structure and stakeholder involvement

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. 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;
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. *
c. not belonging to another company which develops, manufactures and/or sells natural and organic cosmetic products or raw materials either itself or for third parties and not developing, manufacturing and/or selling natural cosmetic products or raw materials himself/herself or for third parties.

** 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 acts impartially*.

6.3.2. Management of impartiality

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.

6.3.3. Division of functions

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:

a. Give advice or provide consultancy services to the applicant/operator as to methods of dealing with matters which are barriers to the certification requested. Barriers can be, for example, non-conformities identified in the course of the certification process. Explanations regarding the 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. Any Training or

services provided must be clearly separated at any stage (offer, application, costs) from the certification services.

6.3.4. Accessibility

The certification body shall make its services equally accessible to all applicants whose activities fall within its declared field of operation. 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 (size of the supplier, or membership to any association, or number of certificates already issued) are applied.

6.4. Access to Information

6.4.1. Publicly accessible information

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:

a. The NATRUE Criteria to be met by operators in order to obtain/maintain certification principally via a link to the NATRUE website in their own website or e-mail exchange with applicants;
b. Information about procedures applied for evaluating whether operators meet the applicable standard principally via a link to the NATRUE website (Flow Chart) in their website or e-mail exchange with applicants;
c. Information about procedures applied to cases where certification is extended principally via a link to the NATRUE website;
d. Information about procedures and sanctions applied where non-conformities with standards are detected;
e. The fee structure for its services;
f. A description of the rights and duties of operators, including requirements, restrictions or limitations on the use of any certification logo and on ways of referring to the certification granted principally via a link to the NATRUE website (NATRUE Label Usage Guidelines) and by timely provision of the latest version of the Agreement on the Usage of the NATRUE Label and its Annexes;
g. Information about procedures for handling general complaints and appeals against its certification decisions.

6.4.2. Confidentiality

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:

a. Protect proprietary information of a client against misuse and unauthorized disclosure;

b. Grant the certification body the right to exchange information with other certification bodies and/or authorities to verify the authenticity of the information.

6.4.3. Reference to certification and use of certification logo (mark)

The certification body shall:

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;
c. Apply suitable actions to deal with incorrect references to the certification system or misleading use of licenses, certificates or logos that it authorizes certified operators to use.

6.5. Quality management system

6.5.1. General

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;
b. The management shall ensure that the quality management system is understood, implemented and maintained at all levels of the organization.

6.5.2. Management system manual

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. 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:
    - An organizational chart showing lines of authority, responsibilities and allocation of functions;
    - 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;
    - A collection of procedures including the following documents: Minutes of the NATRUE Approved Certifiers Conference Call with relevant annexes and any relevant communication forwarded by NATRUE;
    - Procedures for the recruitment, selection, training and assignment of the certification body's personnel (as outlined under 6.2.);
    - Policy and procedures for appeal against certification decisions and other complaints.
    - Policy and procedures for reviewing quality (e.g. internal audits, management review).

c. The certification body shall ensure that the manual and relevant associated documents are accessible to all relevant personnel.

6.5.3. Document control

The certification body shall establish and maintain procedures to control its documents that relate to its certification functions. In particular, the certification body shall:

a. Through authorized and competent personnel, review and approve documents for adequacy prior to their original issue or any subsequent amendment;
b. Maintain a list of all appropriate documents with the respective issue dates and duly identify their amendment status;
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 function relating to the certification body's activities, and prevent the unintended use of obsolete documents.

6.5.4. Maintaining and managing records

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. 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;
c. Operator records shall be up to date and contain all relevant information, including inspection reports and certification history;
d. Records shall also be kept on exceptions granted, appeals and subsequent actions;
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;
f. Maintain a public list of certified operations and the scope of their certification.

6.5.5. Internal audit and management review

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. In particular, it shall:

a. Periodically (biennial basis) 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;

b. Review intervals shall be sufficiently short to ensure that the objective of quality improvement is fulfilled. Records of quality reviews shall be maintained.

6.5.6. Appeals and complaints

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:

a. Take appropriate subsequent action to resolve complaints and appeals;
b. Document the action taken and its effect;
c. Inform NATRUE about complaints and appeals by providing at the end of every calendar year a resume of complaints and/or appeals and actions taken to address them.

7. Process requirements for conducting organic certification

7.1. Application procedures

7.1.1. Information for operators

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:

a. Contractual conditions, including fees and possible contractual penalties;
b. The operator's rights and duties, including the appeals procedure;
c. The applicable standards (latest version of the NATRUE Criteria);
d. Program changes, including regular updates of procedures and standards;
e. The evaluation and inspection procedures applied by the certification body in the course of certification;
f. Documentation to be maintained by the operator to enable verification of compliance with applicable standards by the certification body.

7.1.2. Application form and the operator's obligations

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:

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.

7.2. Evaluation

7.2.1. Scope

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.

7.2.2. Review of application and preparation of inspection

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:
   - Documents submitted by the operator are complete;
   - The operator appears to be able to comply with all certification requirements (applicable procedures and standards);
   - The scope of the certification sought is within the scope of the certification services provided;

b. The certification body shall assign qualified personnel to the evaluation in line with the requirements of 6.2 and 6.3 above, and provide them with appropriate work-related documents;

c. The certification body in order to issue the Preliminary Certificate shall verify the product/raw material formulation's compliance with the NATRUE criteria on the basis of the documentation provided including:
   - Information on the percentage of Natural Cosmetics products within the product range
   - Intended marketing date
   - Information about the production site
   - Quantitative formulation + INCI designation
   - Raw materials proof of origin
   - Envisaged export countries

d. 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.

7.2.3. Inspection protocol

Inspection should be performed within 6 months after issue of Preliminary Certificate. Inspection is carried out in order to verify information and compliance with certification requirements applicable to the operator. It shall follow a set protocol to facilitate non-discriminatory and objective inspection.
The inspection protocol shall at the very minimum undertake the following:

a. Assessment of the production or processing system by means of visits to facilities 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;
e. Verification that corrective actions have been taken.

Successful inspection leads to the issue of the Final Certificate.

7.2.4 Validity of the Certification

a. Even if no new products are submitted for certification, each production site, to the extent that natural/organic cosmetics which are still certified are produced or filled there, must be audited again after two years.
b. The NATRUE label standard works per brand. A production audit is always required when a new brand is subjected to certification even if produced by an operator which is already under the NATRUE system.
c. A second production audit is not required if the operator submit additional products (regardless under which brand they are put on the market) within one year of the original production audit date. If additional products are certified when this period has elapsed, another audit is required.
d. If necessary and depending on the importance and number of changes made to the formulation, costs can be charged for the re-examination of the product documentation

7.2.5 Particular requirements to address multiple production units
Each production unit should be audited as outlined in 7.2.3 However, under its own responsibility; the Certification/control body may take the following scenarios into consideration:

a. Company with different production Units concerning one product P1

Product P1 can be produced in Unit A as well as in Unit B. Unit A and B can be owned by the Company or owned by a subcontractor of the company.
If Unit A has already been successfully audited and if the quality management system of the producing company is also able to present for Unit B tangible documents, proving that:

- the production process and the product quality are well controlled
- the production procedures have been successfully checked by the Certification/control body,

Unit B does not necessarily have to undergo an additional audit. The final decision is to be made by and under the responsibility of the Certification body.

b. Company with different production Units - concerning different products P1 and P2. Unit A and B can be owned by the Company or owned by a subcontractor of the company.

If Unit A has already been successfully audited for a product P1 and if the quality management system of the producing company is able to present tangible documents also for Unit B, proving that:

- the production process and the product quality are well controlled
- the production procedures have been successfully checked by the Certification body,

Unit B does not necessarily have to undergo an additional audit. The final decision is to be made by and under the responsibility of the Certification body.

c. Company with different Units for different production steps (US1 and US2) - concerning one product P1. Unit A and B can be owned by the Company or owned by a subcontractor of the company.

For Product P1, the first production step takes place in Unit A and the second production step in Unit B

If one of the Units has already been successfully audited and if the Certification/control body is provided with the information/confirmation from the quality management system that the production processes are equivalently managed and controlled in both Units.

The second Unit concerned does not necessarily have to undergo an additional audit. The final decision is to be made by and under the responsibility of the Certification body.

7.2.6. Particular requirements to address high-risk situations

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. Parallel production. In order to prevent co-mingling or contamination of organic products with other products that do not meet the 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.
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.

7.2.7. Reporting

The certification body shall report evaluation findings according to documented reporting procedures.

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. The inspection report shall cover all relevant aspects of the standards, and adequately validate the information provided by the operator. It shall include:
   - A statement of any observations relating to conformity with the certification requirements;
   - Date and duration of the inspection, persons interviewed, fields and facilities visited;
   - Type of documents reviewed.
c. The certification body shall promptly notify the operator of any non-conformity to be resolved in order to comply with applicable certification requirements.
d. The certification body shall document and apply measures to verify effectiveness of corrective actions taken by operators to meet the requirements.

7.3. Decision on certification

7.3.1. Division of functions

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.

7.3.2. Basis for the decision

The decision shall be based solely on the conformity of the operation with the certification requirements specified, using information gathered during the evaluation process.

7.3.3. Documentation

Documentation of certification decisions shall include the basis for the decisions.

7.3.4. Dealing with non-conformities

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.

b. Reasons for denial, withdrawal or suspension of certification shall be stated with clear reference to the applicable standard or certification requirement violated.

7.3.5. Exceptions to certification requirements

a. Criteria and procedures for granting exceptions are outlined by NATRUE upon decision by the Scientific Committee Criteria and Label.
b. Exceptions shall be of limited duration, and not be granted permanently.
c. The documentation of any exception shall include the basis on which the exception is granted.

7.3.6. Issuing of certification documents

The certification body shall issue official certification documents to each operator. Documents shall contain the following information:

a. The name and address of the operator whose products are the subject of certification;
b. Name and address of the certification body that issued the certification documents;
c. The scope of the certification granted, including
   - The products certified, which may be identified by type or range of products,
   - The production standard that is the basis for the certification, and
   - The effective date and term of certification.

7.4. Extension and renewal of certification

7.4.1. Re-certification

a. The certification body shall regularly re-evaluate operators in order to verify whether they continue to comply with the applicable standard. Re-certification should be anticipated by written agreement with the company after the first 2 years validity period has elapsed. Mechanisms shall be in place to effectively monitor whether corrective actions have been implemented.
b. The certification body shall report and document its re-evaluation activities, and shall keep operators informed about their certification status.
c. Re-certification generally follows procedures outlined in 7.2. (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 7.2.

7.4.2. Frequency of inspection

a. The certification body shall decide on the frequency for regular inspections as outlined in 7.2.4.
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.

7.4.3. Notification of changes made by the operator

a. The certification body shall require operators to inform the certification body about changes cited in 7.1.2.
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.

7.4.4. Changes in the certification requirements

a. The certification body shall ensure that each operator is notified of any changes in the certification requirements without unnecessary delay.
b. The certification body shall verify the operator's implementation of such changes in a timely manner, within the given implementation periods.
c. NATRUE and its Scientific Committee "Criteria and Label" shall reserve the right to update the NATRUE criteria regularly corresponding particularly to the current state of research and technology. If during the validity period of the certificate/conformity declaration an update of the NATRUE criteria results in a product already certified/controlled no longer complying with the amended requirements, the changes required to the product composition or the manufacturing process must have been implemented at the end of the certification/conformity control period following the current certification/conformity control period at the latest.