

CONTROL PLAN

PDO Bursa Black fig

1. Introduction

The present control plan, as provided in Article 45(5) of the Implementing Regulation of the law No 6769/2016 is associated to the Code of Practices of the PDO Bursa Black fig of the producer group S.S. Bursa Tarım Kooperatifleri Merkez Birliği.

The control plan:

- Describes the different production steps, the requirements to control and the concerned operators.
- Define the organisation of the control (inspection and certification), the role of the producer group in the control and the modalities of control by the control body.
- Describes the identification modalities of the operators as described in the Code of Practices
- Describes the modalities of inspection of the production and the products at the operator levels and specifies the modalities of internal and external control.
- Describe the sanction plan.

This control plan may evolve. Any modification must be approved by the Turkish Patent and Trademark Institution.

2. Scope

All operators included in the supply chain are concerned by the Bursa Black Fig Code of Practices:

- producers
- middleman buying and selling GIs products
- cooperatives gathering and shipping GIs
- producers /traders sorting, grading and packing the fruits GIs

The table below lists the main production steps of the Bursa Black fig and all the requirements that must be controlled:

Production step	Operator	Control Point
Orchards	Producers	<ul style="list-style-type: none">- Localisation of the orchards in the PDO area- Variety- Origin of the plants- Density of plantation
Agricultural Practices	Producers	<ul style="list-style-type: none">- Caprification- Fertilisation- Crop protection- Pruning- Harvest
Sorting	Producers / Warehousemen / /Trader	<ul style="list-style-type: none">- Sorting modalities

Storage	Warehousemen // trader/ packers	- Storage conditions
Packaging	Packers	- Packaging properties
Labelling	Packers/Traders	- Label use
Product characteristics	Packers	- Organoleptic characteristics - Physical and chemical characteristic
General compliance	All operators	- Operators recognition by the right owner - Agreement

3. Organisation of the certification

3.1. General organisation

In accordance with the law No 6769/2016 and its Implementing Regulation, the control body is in charge of the certification of the PDO “Bursa Black fig”.

The control body must be compliant with the norm ISO 17065 although it is not accredited.

The certification is delivered to the right owner (S.S. Bursa Tarım Kooperatifleri Merkez Birliği). Operators authorization required that they fill in a registration form which contains specific information related to their activities and their agreement to respect the Code of Practices requirements.

The initial certification decision will be taken after the verification by the control body of the right owner ability to carry out its tasks: this will be done during the initial control.

Based on the initial certification decision, the control body issue a certificate divided in two parts: one part corresponds to the certification decision regarding the right owner while the other part defines the scope of certification which corresponds to the list of products.

The right owner is periodically inspected to maintain the certification. In case the right owner does not accomplished its tasks/mission, the control body can suspend or withdraw its certification. The Turkish Patent and Trademark Institute will immediately be informed of this decision. This will lead to suspension of commercialisation of any product using the PDO.

In case producers do not respect the requirements of the Code of Practices, a non-compliance will be observed by the control body. This observance will lead to different sanction depending on the severity of the non-compliance. The sanctions and their modalities of application are described in §6 of this document. The non-compliances observed and the associated sanctions of the external control are provided and shared with the right owner.

3.2. Role of the right owner

The right owner:

- Receives producer’ registration and notification of activities and transfers to the control body the list of operators who wish to be authorized;
- Keeps an up-to-date list of operators;
- Informs producers on the requirements of the Code of Practices and on the control plan requirements;
- Contributes to the application of the Code of Practices and participates to the implementation of the control plan by carrying out internal control;
- Ensures the qualification and competencies of internal inspectors;
- Ensures the follow up of the corrective actions implemented after internal inspections

The right owner implements an internal control system to verify the compliance of the registered operators to the Code of Practices.

The right owner is responsible of providing:

- sufficient, competent and trained internal inspectors;
- an internal inspection tool (questionnaire, testing protocol) ;
- an internal control plan: frequency of inspection, sampling
- an administrative officer who will be in charge of managing:
 - the internal control: organize and plan inspections, follow-up non-compliances observed during the internal control
 - the external control: coordination with the control body, follow-up non-compliances observed.

3.3. Control of the right owner and the internal control system

The control of the right owner aims at verifying the competencies and ability of the right owner to carry out its mission (§3.2).

The control body verifies:

- The availability of human resources;
- The competencies of internal inspectors;
- The internal system to manage operators' identification and registration;
- The modalities of information of the operators on the Code of Practices requirements and control system;
- The internal control system implemented by the right owner to ensure the effective implementation of the Code of Practices by the operator: producer' identification, organisation of internal control, follow up of internal control, information to the control body etc.

Internal control is audited yearly by an external the control body.

This control is a pre-requisite before the issuance of the certificate. If the control of the right owner is not satisfactory the certification body won't issue the certificate. In this case, the right owner and the operators are not allowed to make any reference to the PDO.

4. Identification and recognition of operators

Any operator wishing to become involved in all or part of production, storage or packaging of the PDO "Bursa Black fig" is required to notify its activity to the PDO Right Owner to be authorized to use the PDO "Bursa Black fig". Operator's notification and authorization must occur before any production or storage, packaging activities.

Operators wishing to become involved in the PDO Bursa Black fig shall fill in a registration form containing the following information:

For producers

- The list of the plots owned or rented by the producer and the identification of the plots used for the purpose of the PDO Bursa Black fig;
- The map of the plots;
- The identification of the storage and packaging premises (number, location).

For operators involved in the storage of the product:

- The identification of the storage and packaging premises (number, location).

For traders

- The identification of the storage and packaging premises (number, location) as well as the location of the sales points;

All the operators should:

- Provide their name and address;
- Sign an agreement stating that they are committed to respect the current Code of Practices, allowing the control of their plot, or/and their premises, or/and their documentation and that in case of discrepancy they are committed to accept the sanctions decided by the GI Right Owner;
- The agreement shall also indicate that the operator agrees in paying all the fees involved by the GI Right Owner membership.
- The agreement shall be done in two copies (one for the operator, one for the GI Right Owner).

5. Control of producers and of products

5.1. Control pressure: frequency and distribution between internal and external control

The control body carries out an external control of the producers, as a mean to check the efficiency . This control counter-checks the results of the internal control carried out by the right owner.

The control body carry out announced controls at the producer level and the level of post-harvest operators.

The controls carried out at the producers' level are organised in 2 phases:

- Phase 1: during the crop management period
- Phase 2: during the harvesting period

33% of the registered producers must be inspected by the control body annually.

For the first and second years after application, the producers can be selected at random.

The control carried out at the post-harvest operators shall take place during the production season. 100% of the post-harvest operators must be inspected annually.

In case of non-compliance observed during the previous year, the concerned producer shall be inspected again the following year.

Inspected entity	Internal inspection carried out by the right owner	External inspection carried out by the control body
Right owner	-	1 inspection / year

Producers	1 inspection / year	33% of the producers
Post-harvest operators (middleman buying and selling GIs products; dealers buying and selling GIs products; cooperatives gathering and shipping GIs; processors sorting, grading and packing the fruits GIs)	1 inspection / year	1 inspection / year / operator

Unannounced and supplementary controls may be carried out by the control body when:

- Unexpected situations not defined in the control plan occurred: **Supplementary control**
- There is a suspicion or risk of fraud/infringement that may hampered GI products reputation: **Unannounced control**

5.2. Control modalities of the requirements of the Code of Practices

The following tables detailed the control point and the method of control (documentary, observation)

Control is based on three main items:

- interview of the operator,
- review of the available documentations,
- visit of the fields and facilities.

The control body must collect the data during inspection, build coherences between the data coming from interview, visit and documentation.

After each control, the control body delivered an inspection report to the controlled operator. The latest must sign the inspection report. In case of non-compliance, it is clearly stated in the report and this must be signed by the operator as well.

During the on-site inspection, the control body shall collect a sample (1 sample of fruits per controlled producer per year) to be submitted to the tasting committee.

The tasting committee is composed of experts who will annually verify a sample of the products provided by the control body.

5.2.1. Producers' control points

No	Specification reference	Control point	Description	Control method	Major / minor	Sanction 1st infringement	Recurrence of the infringement
General information							
1	§4.1	Notification	Agreement is available and signed	Documented	M	W	LR
Orchards							
2	§3	Localisation	Orchards are located in the delimited area	Documented	M	PD	PD
3	§5.1	Variety	Only Dürdane variety is used	Documented and observation	M	PD	PD
4	§5.2	Origin of the plant	In case of new plantation, seedlings come from nurseries located in the delimited area	Documented	m	R	W
5	§5.3	Density	Orchards do not exceed 22 trees/da	Documented and observation	M	PD	PD
6	§5.3	Pollution	Orchards are safe from industrial contamination	Documented and observation	M	PD	PD
Production methods							
7A	§5.4	Caprification	Caprification is done using a 'ilek'	Interview and observation	M	W	LD
7B	§5.4	Caprification	Caprification is performed between June and mid-July and is repeated 3 times with one-week intervals	Documented and interview	m	R	W
7C	§5.4	Caprification	At least 10 caprifig 'ilek' are hang on one fig tree	Interview and observation	m	R	W

8A	§5.5	Fertilisation	A fertilisation plan is available and is based on a soil analysis	Documented	m	R	W
8B	§5.5	Fertilisation	Fertilisation is down between February and April	Documented	m	R	W
8C	§5.5	Fertilisation	A complete soil analysis on one plot is performed at least every 2 years	Documented and interview	m	R	W
8D	§5.5	Fertilisation	Organic fertilizers is provided at least every two years in the orchard and at least a yearly quantity of 4 to 5 tons/da must be provided	Documented and interview	m	R	W
8E	§5.5	Fertilisation	The NPK fertilization do not exceed the authorized quantities: 0,75 kg of N – 1 kg of P -2,5* kg of K per tree	Documented and interview	m	W	PD
9A	§5.6	Crop protection	Chemical pesticides are used only in case of severe attack	Documented, interview and observation	M	W	LD
9B	§5.6	Crop protection	In case of use of chemical pesticides the doses and uses conditions are respected	Documented and interview	M	W	PD
9C	§5.6	Crop protection	The pesticides listed in the up-to-date list of prohibited pesticides issued by the Turkish Ministry of Food, Agriculture and Livestock and in the WHO list 1A and 1B are not used	Documented, interview and observation	M	W	PD

10	§5.9	Pruning	Pruning is done in February-March	Documented, interview and observation	m	R	W
Harvesting and post harvest operations							
11A	§5.10	Harvest	Harvest is done by hand	Interview and observation	M	W	LD
11B	§5.10	Harvest	Harvest takes place in the morning and before 11 a.m.	Interview and observation	m	R	W
11C	§5.10	Harvest	Fruits are collected in clean collection containers	Interview and observation	M	W	LD
11D	§5.10	Harvest	Harvesters wear gloves or there is a cleaning point at each plot	Interview and observation	M	W	LD
11E	§5.10	Harvest	Fruits in contact with the soil are rejected	Interview and observation	M	W	LD
12A	§5.11	Sorting	Fruits are sorted and graded at the farm level or at the cooperative level or the any place that belongs to trades in a clean area.	Interview and observation	M	W	LD
Traceability and records keeping							
13	§4.4	Physical traceability	Each batch of fruit is traceable from harvest to commercialisation with a code number or digital code	Documented, interview and observation	M	W	LD
14	§4.4	Cultivation register	A record on fruits production is available and records the following information: - Quantity harvested - Plot number The record ensures the link with the batch number.	Documented	M	W	LD

15	§4.4	Stock register	<p>A record on stock account is available and records:</p> <ul style="list-style-type: none"> - The estimated harvest - The quantity harvested - The quantity certified 	Documented	M	W	LD
16	§4.4	Sales and purchase register	<p>A record of the sales and purchase is available and records the following information:</p> <ul style="list-style-type: none"> - Quantity purchase/sold - Supplier's / client's name <p>A receipt of delivery is available</p>	Documented	M	W	LD
17	§4.4 §5.5	Fertilisation register	<p>A record on fertilisation shall be available and record the following information:</p> <ul style="list-style-type: none"> - Date of fertilisation - Plot number - Fertiliser used - Quantity applied 	Documented	m	R	W
18	§4.4 §5.6	Crop protection register	<p>A record on crop protection shall be available and record the following information:</p> <ul style="list-style-type: none"> - Date of spraying - Plot number - Product used - Doses used 	Documented	m	R	W
19	§4.4 §5.7	Soil Management register	<p>A record on soil management shall be available and record the following information:</p> <ul style="list-style-type: none"> - Date of activity - Plot number - Operation (ploughing, weed control, crashing the branches etc.) 	Documented	m	R	W

5.2.1. Post-harvest operators' control points

No	Specification reference	Control point	Description	Control method	Major / minor	Sanction 1st infringement	Recurrence of the infringement
General information							
1	§4.1	Notification	Agreement is available and signed	Documented	M	W	LR
2	§3	Localisation	Activities are carried out in the delimited area	Documented	M	PD	PD
Products characteristics							
3	§2.2	Product characteristics	Conformity with specifications characteristics for the physical and organoleptic quality of the product	Analysis and organoleptic test	M	LD	TE
Harvesting and post harvest operations							
4	§5.12	Storage	Sorted figs are stored at +2°C	Observation	M	LD	LD
Packaging							
5	§5.13	Packing	Fruits are packed in the defined package	Documented and observation	M	W	LD
Labelling							
6	§7	Labelling	Specific elements of labelling are used on the final package	Documented and observation	M	W	LD
Traceability and records keeping							
7	§4.4	Physical traceability	Each batch of fruit is traceable from harvest to commercialisation with a code number or digital code	Documented, interview and observation	M	W	LD

8	§4.4	Stock register	<p>A record on stock account is available and records:</p> <ul style="list-style-type: none"> - The estimated harvest - The quantity harvested - The quantity certified 	Documented and observation	M	W	LD
9	§4.4	Sales and purchase register	<p>A record of the sales and purchase is available and records the following information:</p> <ul style="list-style-type: none"> - Quantity purchase/sold - Supplier's / client's name <p>A receipt of delivery is available</p>	Documented	M	W	LD

6. Sanction plan

Control aims to compare the expected situation with the current situation. The expected situation is described in the Code of Practices. The current situation is described by the control body during the inspection. A non-conformity is observed when the current situation is different from the expected one.

Non-compliance should not happen and must disappear. This is why when a non-compliance is observed a sanction is applied according to the seriousness of the non-conformity. Corrective actions must be implemented to solve the non-compliance

6.1. Non-compliance observance – classification

Any non-compliance observed must be listed in the inspection report (during internal or external controls) and must be shared with the operator or the right owner.

For each non-compliance, the information below must be provided:

- The precise terms of the non-compliance, and if it is related to a product the batch reference should appear;
- The level of severity of the non-compliance.

6.2. Follow-up of the non-compliances observed during internal control

Any non-compliance observed during internal control must be notified to the operator.

The right owner informs the operator of the corrective actions that can be implemented to solve the non-compliance.

The right owner must record the non-compliances observed and the expected corrective actions that shall be implemented by the operator. This record will be verified by the control body.

6.3. Follow-up of the non-compliances observed during external control

Any non-compliance observed during external control are listed in the inspection report and are notified to the operator and the right owner. The control body requires the implementation of corrective actions. The effective implementation of the corrective actions will be verified during the next control. In any case, the operator or the right owner must provide to the control body its corrective action plan within a specific timeframe (see table below) to solve the non-compliance. The control body will notify the operator and the right owner of its certification decision.

A copy of the inspection report is provided to both the operator and right owner after inspection.

The sanction that can be observed are the following:

Sanction		Clarification	Time to respond to the non-compliance	Time to implement the corrective measure(s)
Minor NC	Remark (R)		-	-
	Warning (W)	After 3 warning without effect; temporary exclusion	30 days	3 years
	Batch downgrading – Plot downgrading (LD - PD)		15 days	Immediate effect

Major NC	Temporary Exclusion (TE)	Operators are not allowed to display the logo or use any GI mention during the exclusion time. After 2 temporary exclusions: definitive exclusion. (TE)	15 days	Immediate effect
	Definitive Exclusion (DE)	Operators are not allowed to display the logo or use any GI mention anymore. A batch of product is excluded.	Immediate effect	Immediate effect

The control body will inform the right owner of its certification decision. The right owner is in charge of submitted the inspection reports and decision of certification to the Turkish Patent and Trademark Institute at least once a year.