

ECOCERT Audit Preparation Guidelines

The document has been completely reorganized, modifications are not identified.

Regardless of your activity (subcontractor or manufacturer, brand owner, handler), you will be audited for the first time for one of the following programs: ECOCERT Cosmetics / COSMOS Cosmetics / ECOCERT Candles and Home Fragrances / ECOCERT Detergents / ECOCERT Paints and Coatings. This first audit is called "approval audit" and has to take place before any activity related to the production and/or the commercialisation of controlled/certified products starts.

The following years, audits will be called "renewal audits" and will be done in order to maintain and renew control/certification documents.

Number of audits per year:

If your company is declared as manufacturer or subcontractor, a second audit called "follow-up audit" may take place during the semester following your first audit (cf. the audit plan of your control/certification process TS004).

The number of renewal audits (either 1 or 2 per year) will be determined according to your company's activity (number of products to be controlled/certified, number of ingredients, quality system, etc...) and to a risk analysis which may be reviewed annually.

If your company is declared as brand owner or handler, the number of renewal audits is 1 per year.

Control of certification requirements:

During a complete audit, all the control/certification requirements will be checked. On the other hand, all the control/certification requirements will not be checked exhaustively during the follow-up audit. The auditor will select the control/certification requirements depending on your activity and, potentially on the non-conformities of the previous audits.

The table below will help you prepare the audits. Some requirements applying only to specific programs are identified by the colour codes below. The lists and documents should be updated if modified (via the Greenportal or sent to your certification officer), more specifically at least two weeks before the audit date. For more information about your submissions on the Greenportal and the requirements of our different programs, please review our practical guides on the Ecocert website (<http://www.ecocert.com>, in "Business sectors") and select the program for which you apply.

The audits are conducted by sampling. It means that all the documents exchanged with Ecocert, and all your products might not be checked during the audit. However, they must be available for the auditor at his request.



Text in black applies to all our programs

Text in red applies exclusively to Ecocert cosmetics and COSMOS programs

Text in purple applies exclusively to COSMOS program

Text in blue applies exclusively to Paints and Coatings program

Stage / Point that could be checked during the audit	Information, documents, lists to keep available	Code of corresponding Ecocert documents
Products to be certified/controlled (for clients committed with Ecocert)		
<p>Checking of the conformity of your Greenportal submissions from the product list.</p>	<ul style="list-style-type: none"> - The updated list of products to be certified/controlled. - The Ecocert approvals for labels and packaging materials. - Samples of certified/controlled products to check labels and packaging materials used. - Grouping of products if existing (boxes, cases, etc...) - Related quality documents (monitoring procedures for the validation of the different stages of a new product, management of certified/controlled products, etc...) <p>- For COSMOS program only: Formalized policy for minimizing the impact of the certified products packaging materials, and associated revision(s)</p> <p>- for Paints program only: Technical files with Chemical classification, technical performance, VOC content and/or emissions, TiO₂ rate (attestations, calculations, analysis report...)</p>	<p>Product list checked on the Greenportal by the auditor during the audit. F003(GP) - List of products to be checked</p>

Communication documents (for clients committed with Ecocert)		
<p>Checking of the conformity of your communication documents referring to Ecocert (use of the name and/or the logo)</p>	<ul style="list-style-type: none"> - Marketing documents (samples, leaflet, website, catalogue, PowerPoint, etc...) - Ecocert approvals of these communication documents (any new communication document or modification of existing documents must be submitted to Ecocert before printing or uploading) - Related quality documents (internal monitoring procedure for validation of the communication documents) <p style="color: red;">For Ecocert and COSMOS cosmetics programs only:</p> <ul style="list-style-type: none"> - Updated list of communication documents under Ecocert template, approved documents and signed F373(GC-COS) commitment for communication documents. If the commitment is not signed, see requirements above. - If existing, signed F372(GC-COS) form for the translation conformity must be available. 	<p>NA</p> <p>NA</p> <p style="color: red;">-F374(GC-COS)v01en - List of communication documents -F373(GC-COS)v02en - Commitment for the communication documents -F372(GL)v01en - Commitment for the conformity of translations</p>
Ingredients used in the certified/controlled products formulations (for clients who purchase ingredients)		
<p>Checking of the conformity of purchased ingredients</p> <p>Management and monitoring of supplies, purchases and ingredients reception</p>	<ul style="list-style-type: none"> - Purchase invoices, delivery notes of all the ingredients used in the certified/controlled products, and organic certificates valid on the purchase date for organic ingredients (you must guarantee the compliance of the organic quality for organic ingredients. Before any order or ingredient release in production, a valid organic certificate must be hold) => Before any purchase of a new ingredient and/or a new supplier, an approval must be delivered by Ecocert. - Attestation of origin in the case of a sale by a distributor, or proof of origin on invoices/delivery notes or on any other document. - Physicochemical and/or microbiological analysis, internal or suppliers' certificates of analysis, ingredients reception sheets or other records for the ingredients, including water used as an ingredient in the manufacturing process. - The ingredients in their original containers, or any document proving the conformity of the original label and maintaining the traceability and quality of the raw material in case of an internal re-labelling or re-packaging. - Related quality documents (internal monitoring procedure for the follow-up and referencing of your suppliers, suppliers specifications, management of suppliers non-conformities, etc...) <p style="color: purple;">- For COSMOS program only: results of microbiological analysis for water used as an ingredient in the manufacturing process.</p>	<p>Ingredient list checked on the Greenportal by the auditor during the audit. F005(GP) - List of ingredients and suppliers</p>

Subcontractors and/or handlers (for clients who work with one or more subcontractor/handler)

<p>Checking of the conformity of subcontractors and handlers</p> <p>Management and monitoring of supplies, purchases and products and/or bulks reception</p>	<ul style="list-style-type: none"> - The updated list of your handlers and subcontractors under the Ecocert template. - The certificates and/or attestations of your subcontractors and/or handlers valid on the purchase date (you must ensure the conformity of your subcontractor/handler by checking its certificate/attestation validity before any purchase/release of ordered products/bulks). - Purchase invoices and delivery notes of your subcontractors/handlers. - The contracts or specifications established between you and your subcontractors/handlers, and describing the responsibilities of each parties. - Related quality documents (procedures, instructions, contract/specifications, management of subcontractor/handler non-conformities, etc...) 	<p>F334 – List of your handlers and subcontractors</p>
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Committed or non-committed handling and non-committed subcontracting activity for a brand owner (only for handlers, or clients with a handling activity, or for non-committed subcontractors)

<p>Checking of the conformity of services provided</p>	<ul style="list-style-type: none"> - The updated list of your handling and non-committed subcontracting activities under the Ecocert template. - The delivery notes for ingredients/products sent by your client. - Your sales invoices and delivery notes concerning the handling or subcontracting activity for your client. - The temporary labels under your responsibility, and finished products/bulks samples, etc. - Related quality documents (procedures, instructions, management system for non-conformities, etc...) -The contract or specifications established between you and your client, and describing the responsibilities of each party. - For handlers only: the guarantees to add on your invoices and delivery notes should refer to a notion of "Service provision checked by Ecocert Greenlife". It should be phrased in the way that no confusion could be possible between a subcontracted product and handling service. 	<p>F335 – Description of your activity for each operator</p>
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Cleaning and disinfection products (only for clients with a manufacturing process or a primary packaging (filling) process)

<p>Checking of the conformity of the cleaning and disinfection products used</p>	<ul style="list-style-type: none"> - The updated list of cleaning and disinfection products under the Ecocert template. - If Ecocert certified Natural Detergents are used, you must present a certificate valid on purchase date. - The Technical Data Sheets and Material Safety Data Sheets of each cleaning and disinfection products. <p>The cleaning and disinfection products which are used before and after each certified/controlled production step must be compliant and approved by Ecocert before use.</p>	<p>F336 – Production tanks and conditioning lines detergents list</p>
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Onsite audit : supplies, reception, production facilities, filling, packaging, storage (only for clients with a manufacturing process or a primary packaging (filling) process)

<p>-Visit of the production facilities and filling lines, storage area(s), sample library, etc. -Control of operating methods, instructions/procedures in the production areas, records, etc.</p> <p>Checking of cleaning and disinfection products, auxiliaries, etc.</p>	<ul style="list-style-type: none"> - Plan of premises and facilities - Weighing equipments and flowmeters metrological follow-up - Related instructions/procedures (reception, weighing, production, filling, packaging, storage, etc...) - Products retain samples <p>=> For the good proceeding of the onsite audit, it is preferable that a production/packaging activity (controlled/certified or not) is carried out during the audit. If no activity is scheduled at the audit date, please let the auditor know as soon as possible.</p> <p>- For paints program only: if an anti-skin gel is added after the product is packed, then this gel must be counted as an ingredient of the formula and therefore must be declared to Ecocert via the formula sheet (Warning: if you plan to certify several packaging sizes, the quantity of anti-skin gel can be different from one packaging to another and will not be proportional to the product quantity but to the surface to cover)</p>	<p>NA</p>
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Environmental management program and plan (only for clients with a manufacturing process or a primary packaging (filling) process)

<p>Checking of the environmental policy and related actions</p>	<p>This point concerns waste (selective sorting, specific destruction), discharge and energy management (consumptions).</p> <ul style="list-style-type: none"> - The environmental analysis plan, adapted to your company's activity - The environmental management plan, according to this analysis plan - The results, follow-up indicators and action plan - The possible contracts with external service providers. <p>- For COSMOS program only: requirements only on discharge and waste management, not on energy management. Measures of reduction of the products packaging impacts, and associated revision(s).</p>	<p>NA</p>
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Traceability and flow control

<p>Checking of the traceability via production/batch files since the last audit or since the activity started. (for clients with manufacturing activities and/or responsible for formulas and registrations to Ecocert)</p>	<p>=> Please be aware of the following for the registration of your formulas and productions:</p> <ul style="list-style-type: none"> *pH adjusters and thickeners must be declared up to the maximum that can be introduced in production under usual conditions. *Ecocert's weighing tolerance is $\pm 1\%$ compared to the ingredient's initial quantity to be weighed. This applies to all of our programs, except for detergents program in which the tolerance is $\pm 5\%$. If your own tolerance is higher, you must justify it during the audit and ask for a derogation from your certification officer, explaining the reasons of this difference. *Water evaporation: if you take into account the water evaporation during your productions, by adding more water than the initially intended quantity approved on Ecocert formulas, you must justify it by presenting studies which prove this evaporation. Otherwise, you must declare the quantities of water you really add in your formulas. 	<ul style="list-style-type: none"> - F007 – sheet for all formulas except those below - F305 – Formula sheet (for extracts) - F306 – Formula sheet for COSMOS non aqueous COSMOS extract. -F307 – Formula sheet (for soaps) for formulas approved previously. -Formula sheets from the Greenportal.
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<p>Checking of the stock management system (purchases, sales, storage, ingredients and products flows, etc...) since the last audit or since the activity started</p>	<ul style="list-style-type: none"> - During your audit, the auditor may check one or more production files of Ecocert products (manufacturing and/or filling/packaging: manufacturing and filling/packaging orders, manufacturing and filling/packaging sheets, cleaning registration, line clearance, etc...) to be completed by: <ul style="list-style-type: none"> * Ecocert Greenlife formula approvals * Purchase invoices and delivery notes of all introduced ingredients (the batch number on invoice and delivery note must correspond to the ingredient's batch number used in the selected production) * The organic certificates valid on purchase date for organic ingredients, and attestation of origin in case of sale by a distributor * The related sales invoices and delivery notes * The analysis reports for raw materials, bulks, and finished products * The cleaning registration before and after production and filling * The physicochemical and/or microbiological analysis, internal or suppliers' certificates of analysis, ingredients reception sheets, other records for the ingredients, including water used as an ingredient in the manufacturing process. * A product sample corresponding to the selected batch(es). - Stock status (physical inventories) of the previous and ongoing year for ingredients/bulks/products - Products purchases/sales/deliveries figures and overviews - Ingredients purchases/sales/deliveries figures and overviews - The traceability system (batch number, ingredient and finished product follow-up etc...) - Manufacturing/filling/packaging batch files. 	
<p>Products commercialisation (not for handlers)</p>		
<p>Checking of the conformity of transaction documents</p>	<ul style="list-style-type: none"> - The updated products certificates. - Sales invoices and delivery notes. <p>The following guarantees must be added to your transaction documents for the products concerned by the certification/control:</p> <p>*Certification level statements: "Org", "Eco", "Nat" associated with concerned products and, if necessary, reference to the type of product "COSM", "DET", "HOME FRAGRANCE", "PAINT" and/or the concerned program "ECOCERT", "COSMOS" in case of a risk of confusion.</p> <ul style="list-style-type: none"> - The related procedures/instructions (management and follow-up of the products certificates, system for checking the use of the guarantees on invoices and delivery notes) 	<p>Certification/control program of the audited activity</p>

Certification and regulation requirements knowledge and follow-up

Checking of certification requirements	<ul style="list-style-type: none"> -The certification/control Standards and Ecocert’s Newsletters. -The customer complaints register and related quality documents (procedures, instructions and registration). -The physicochemical and/or microbiological analysis registers for ingredients and/or bulks and/or products. -The finished products retain samples and related quality documents (procedures, instructions, etc...). In case of management outsourced to the manufacturer, a written proof must be presented to the auditor. 	NA
Checking of Products Information Files	<p>- Ecocert and COSMOS Cosmetics programs only: the Product Information Files according to the cosmetic regulations for the certified products.</p>	NA

Possible sampling of ingredients / bulks / products

Samples(s) carrying out	In case of suspicion of fraud or cross-contamination, or on Ecocert headquarters’ demand, the auditor may take samples of ingredients, bulks or finished products.	NA
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Contract review

Turnovers	<ul style="list-style-type: none"> - Total turnover (ex. VAT) of the company for the last financial year - Turnover per products’ category for the last financial year: <ul style="list-style-type: none"> * Cosmetics (certified and non-certified cosmetics all together) * Detergents (certified and non-certified detergents all together) * Candles and Home fragrances (controlled and non-controlled all together) * Paints and Coatings (controlled and non-controlled all together) - Turnover related to the certified/controlled products per category (certified Ecocert and COSMOS cosmetics, certified Natural detergents, controlled Candles and home fragrances, controlled Paints and Coatings) 	NA
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Important points to observe:

TRACEABILITY:

- Make sure you keep all received accounting documents (purchase invoices and delivery notes), as well as a copy of all issued accounting documents (sales invoices and delivery notes). In addition, make sure that the traceability is maintained all along the process, from the ingredients to the finished products.

MIX/CONTAMINATION:

- Make sure there is no risk of contamination or confusion during the different stages of the process (storage, manufacturing, etc...)

DOCUMENTS:

- The notification of visit (that you will receive from the auditor) lists all the documents to prepare and to make available.

PARTICIPANTS:

- Make sure all persons in charge of the different steps of the audit are present and available.

IDENTIFICATION OF CERTIFIED PRODUCTS:

- Guarantees which allow to clearly identify the certified products must appear on invoices, delivery notes and temporary labels (bulks, repacking). Make sure to avoid any confusion with non-certified products, or between different certification/control programs.

Examples of possible statements on transaction documents (clear and sufficient identification related to each activity):

Purchased / sold product	Minimum guarantees on invoices / delivery notes
Organic certified ingredient	Organic ingredient Or Organic Raw material Or Organic
Product	Organic/Natural product (or for instance organic cosmetic) Or Organic/Natural (or Org/Nat)
Service provision	Organic service (or for instance organic packing) Or Controlled Service (or for instance controlled packaging)

Examples for certified products:

Identification on transaction documents must include clear and sufficient statement to avoid any confusion.

Encountered cases	Examples
Products certified under two different levels of certification (NAT. and ORG., etc.)	ORG shampoo / NAT shampoo ORG citrus home fragrance / NAT Citrus home fragrance Natural Detergents washing-up liquid / Natural detergents made with org. washing-up liquid
Products certified under two different programs (COSMOS and Ecocert, etc.)	ORG Cosmos cream / ORG Ecocert cream In the case of organic certification under Ecocert program and under COSMOS program (double certification for the same product), Org Ecocert & Cosmos cream can be used for instance
Products certified under two	Organic Cosmetics essential Oil / Organic Home Fragrances

<p>different activities (Home fragrances and Cosmetics, etc.)</p>	<p>essential oil ORG COSM essential oil / ORG HF essential oil</p> <p>In the case of a product certified as ORG Cosmetics and as ORG Home Fragrances (double certification for the same product), ORG. Cosmetics and home fragrances essential oil or ORG COSM & HF essential oil can be used for instance.</p>
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