



GUIDANCE ON THE APPLICATION OF NSO-NAP SERIES FOR NATURAL CERTIFICATION



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OF NSO-NAP SERIES FOR NATURAL
CERTIFICATION**

Issue No 1

Approved by: i-NAF MLA Group
Issue Date: 22.01.2018

Date: 02.01.2018
Application Date: Immediate

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INTRODUCTION

NSO-NAP X (NAP Series) is an International natural standard which sets out criteria for natural bodies operating natural certification of products, management system and processes. One of the important certifications in this area is certification of natural products, system and/or processes.

Since there is an increasing demand for natural products & hygiene, health and safety management system in many developed markets, there is also a greater demand for certification of natural products by the accredited NCBs operating in the respective countries as well as those interested in exporting to developed markets.

PURPOSE

This document intends to provide such guidance and has three main purposes:

- to enable natural accreditation bodies (NABs) to harmonize their application of the Natural standards against which they are required to assess the natural certification bodies (NCBs),
- to facilitate mutual recognition of natural accreditation process, especially to facilitate the recognition of different natural certification guides for mutual acceptance,
- to assist NCBs themselves and to those stakeholders (such as regulators, guide owners or buyers), whose decisions are guided by the certificates issued by the NCBs.

Although currently the document is written in the form of a guidance document, the NCBs are encouraged to implement the certification guide and certification processes in general based on the guidance provided. This would eventually help the NABs in assessing the NCBs for the purpose of accreditation in a harmonized way.

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1 SCOPE

This document provides based guidance on application of NSO-NAP X to natural certification.(NSO: International Organization for Natural Standardization).

2 NORMATIVE REFERENCES

Those specified of the NSO-NAP X /Natural Certification Guides apply.

3 GENERAL REQUIREMENTS**3.1 Legal and contractual matters**

3.1.1 Legal Responsibility
No legal guidance.

3.1.2 Natural Certification Agreement

3.1.2.1 The natural certification should be based on written agreements, with clear responsibilities of all parties involved in the chain of operations for natural production of an natural certified product.

3.1.2.2 The natural certified clients should sign agreements requiring them to:

- follow the requirements given in natural production&service&system standards and other documents such as the natural certification guides or any other document describing the natural certification process,
- not to use any prohibited items in its production of natural products,
- accept inspections, including unannounced inspections and direct inspections by the NCB or any other party as per the applicable requirements specified in the natural certification process,
- supply accurate information,
- notify the relevant parties (including the NCB) of any changes in accordance with the requirements specified in the certification guides,
- inform the NCB of all complaints received by the certified clients relating to the natural certified products,
- any other requirement as per the certification guides.

3.1.2.3 The NCB should ensure that its natural certification agreement requires that its clients (applicants and certified clients, as applicable) comply with the following natural certification specific requirements:

- provide access to the inspector(s) of the NCB, to all relevant facilities of natural production&management system&service, including accounts and sales related records and other relevant documentation to provide adequate audit trails and traceability of natural certified products&services,

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- b) access to its record keeping system adapted to the type of production&services that enables the NCB to retrieve necessary information and to seek verification of the production&services, storage, processing, purchase and sale,
- c) provide access to non-natural production units or units associated by ownership or management to the client, to enable the NCB to assess any impact on contamination or mix up with the certified natural produce,
- d) should provide the NCB with updated information on the natural certification guides of inspection and testing, which the certified client maintains or intends to maintain for ensuring natural integrity,
- e) should permit the NCB to share information with other NCBs and authorities when appropriate and essential (see 3.5.1).

3.1.3 Use of Licenses, Certificates and Marks of Conformity

3.1.3.1 The natural certification mark which indicates natural status should not be used on non-natural products and/or management system or on documentation accompanying such product&services.

3.1.3.2 The natural certification mark should only be applied to product&system where compliance with the natural certification requirements has been ensured. The NCB that natural certified the last process (processing, packing, labelling, services) should be identified.

3.1.3.3 Conformity of the natural certified product and/or system should be monitored in accordance with the natural certification requirements.

3.2 Management of Impartiality

3.2.1 The NCBs that are administered by natural producer&service organizations, should ensure clear separation of activities and all requirements with respect to impartiality in decision making and other activities should be ensured by the NCB. Further, it should be ensured that the requirements specified of NSO-NAP X (related natural standard) regarding the activities of the NCB should be complied with at all times.

3.2.2 The NCB should not offer any services that question its objectivity and impartiality. Such services may however include marketing and promotion activities for natural products in a generic way.

3.3 Liability and Financing

The natural product manufacturer&service companies should take responsibility and provide the necessary funding.

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3.4 Confidentiality

Whilst maintaining confidentiality of information, the NCB should have provision for exchange of information as necessary.

3.5 Publicly Available Information

3.5.1 The NCB operating the natural certification guides should have processes for informing all concerned including the prospective and present natural certified clients about the applicable natural standards for the different natural product categories, management system and the program changes including updates of procedures and natural standards. This should be in a language appropriate to the clients.

3.5.2 The NCB should identify clearly the natural standards and requirements used for the different natural product categories&management system. These should be available to the applicant. The detailed information regarding natural standards against which the natural products&system will be natural certified and the natural certification requirements and the general information on fees charged should be made available through publications and electronic media, and should generally be made available on the NCB's website.

4 RESOURCES REQUIREMENTS**4.1 Natural Certification Body Personnel****4.1.1 General**

The NCB should ensure that its personnel have sufficient knowledge on natural certification.

4.1.2 Management of competence for personnel involved in certification process

4.1.2.1 The following criteria should be applied to NCB personnel, which should include but not limited to, as appropriate, the contract review personnel, inspection and evaluation personnel, technical reviewers and decision makers. The NCB personnel should:

- a) have sufficient background and knowledge in agriculture and/or food science/technology (if applicable), farming, aquaculture, halal, eco production, textile, energy and processing/packaging, etc. The requirements may vary based on the functions undertaken by the personnel and the product category. Knowledge may be gained typically through educational qualification, work/audit experience and/or appropriate training, adequate to provide knowledge of natural products/product categories; relevant regulations and

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standards; production, management system and processes: natural certification process and natural certification guides requirements, as applicable to the functions undertaken,

- b) have initial training for inspection personnel should typically include aspects such as natural processing, halal processing, textile processing, eco-ecologic processing, vegan processing, food and feed processing, trade, specific production areas, hygiene, healthy and safety management system processing and relevant natural standards, natural certification requirements and where appropriate, training on evaluation and certification of smallholder groups,
- c) be qualified and authorized on the basis of use of appropriate evaluation methods;

Note: A combination of evaluation methods such as review of records; feedback; interviews; observations/witness; examination should generally be used to evaluate knowledge and skills.

- d) depending upon the initial qualification and experience of individuals, the qualification process may include just an evaluation of knowledge and skills, an induction period or a supervised working period with experienced inspectors or a combination of these measures. Before being authorized for carrying out inspection activities independently, the inspection personnel may participate in scope based inspections, as observers or under observation of experienced inspection personnel. The number of such inspections they need to undergo for getting qualified and authorized should be decided by the NCB, based on their initial competence level,
- e) during the qualification and authorization process, qualifying inspection personnel to different product categories such as crop production; food, packaging material, etc.

4.1.2.2 The NCB should ensure that the inspection team should have competence in the natural standard category of the client who is being inspected. The competence can be built through nomination of a technical expert qualified in the same product/system category.

4.1.2.3 The NCB should have access to experts or group of experts knowledgeable in natural certification requirements as applicable to certification of natural production processes and products and/or management system, for the purpose of development of natural certification requirements appropriate for ensuring that sufficient objective evidence is obtained as a base for its decision making. The ultimate objective of this exercise should be to ensure that the natural production processes and natural products and or management system certified continue to comply with the natural product&system requirements specified in the relevant natural standards(NSO-NAP Series) .

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4.1.2.4 The NCB should actively identify training needs at entry level as well as based on needs identified through systematic performance reviews and provide, as necessary, training to its staff on the requirements of the natural standards, the natural certification program and relevant methodologies. Adequacy of such training plans, training and evaluation records, and the related records should be maintained.

4.1.2.5 The performance monitoring for each evaluator/inspector should include observation in on-site inspection, normally not longer than every three years, unless there is sufficient supporting evidence that the auditor is continuing to perform competently.

4.1.3 Contract with the personnel

The NCB (Natural Certification Body) should make a contract with the staff.

4.2 Resources for Evaluation

4.2.1 Internal Resources

See 4.1.1, 4.1.2.1 – 4.1.2.5 above.

4.2.2 External Resources

4.2.2.1 Outsourcing of testing (e.g. of input materials, naturaland/or organic certified products, etc. for residue requirements, genetically modified organisms, syrup, gas etc. Vegan, hygiene and others) should be carried out on a risk based assessment by the NCB.

Note: Residues” is a generic term used for any type of chemical residues such as pesticide residues, veterinary drug residues, etc.

4.2.2.2 The NCB should ensure that the testing activities are subcontracted to competent laboratories as demonstrated either by the sub-contracted laboratory having accreditation and licensed to ISO/IEC 17025 for the relevant tests and providing endorsed (logo/mark) reports or the NCB itself assessing the competence of the sub-contracted licensed laboratory to the requirements of ISO/IEC 17025.

4.2.2.3 Where the assessment of the sub-contractor is carried out by the NCB, it should be able to demonstrate that the assessment team is technically competent and knowledgeable in the application of ISO/IEC 17025 for the relevant fields of testing.

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5 PROCESS REQUIREMENTS**5.1 General**

- 5.1.1 The natural requirements and procedures set up by the NCB should take into account the requirements stated in the relevant natural standards (NSO-NAP Series) and natural certification requirements specified in a natural certification guides. These should include any other supporting requirements as prescribed by the regulator or the scheme owner.
- 5.1.2 Any natural certification guides followed by the NCB could have defined requirements for NCB's functioning as well as natural certification process requirements. NCB requirements covering natural certification should primarily be based on natural standards as applied to certification of organizations engaged in natural production and/or system in accordance with the relevant natural standard. In case the requirements specific to natural certification have been documented by the Regulator (NBE Foundation.) / Natural Accreditation Body / Natural Certification Guides owner then the NCB can directly base its natural certification system on the prescribed requirements.
- 5.1.3 The natural certification guides used by the NCB or the natural certification process developed by the NCB should have available and implement policies and procedures for aspects such as, risk assessment methodology and risk based inspections; procedure for estimation of minimum inspection time; policy and procedure for sampling; surveillance assessments including provisions for unannounced inspections; management of deviations; categorization of non-conformities and corrective actions; procedure for accepting client's from other NCBs; exchange of information with other NCBs and authorities (approval natural bodies or natural accreditation bodies) as appropriate and a policy for the annual report to the regulator as per requirements specified in the relevant natural standards, as applicable.
- 5.1.4 The natural certification guides covering natural certification generally have provision for acceptance of certificates of natural products and/or management system in accordance with the specific requirements when the natural products and/or system in the manufacturing chain have been certified by other natural bodies only if the two natural certification bodies have the equivalent natural certification procedures and requirements. Accordingly, the NCB needs to develop as part of its natural certification procedure (in case not detailed in the natural certification guides) the acceptance procedures of natural certificates by other NCBs by taking into account the following:
- a) on the basis of the same natural certification guides,
 - b) cooperation between the NCBs in accordance with specific agreement

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- 5.1.5 The natural certification process developed/used by the NCB should have documented policies and procedures on residue testing, colorant testing, testing of genetically modified organisms, input materials etc. vegan, hygiene and others as relevant to establish natural integrity and in accordance with the relevant natural standard.

These should generally include the following:

- a) system for identification of cases in which samples are to be taken for analysis, such as where use of a substance prohibited by the standards, is suspected,
- b) a procedure on how to take samples and send them to laboratory for testing purposes,
- c) the number of samples taken per annum should generally be based on risk assessment and should be appropriate to the requirement specified in the relevant certification scheme/regulation, if any.

Note: Number of samples taken per annum representing 5% of the clients under the scheme are generally considered as adequate.

5.2 Application

- 5.2.1 The natural certification guides should not generally allow clients to switch in and out of the certification system. Information collected at application stage should include information on the status and details of previous certification of natural production and/or management system, if any. While accepting an application for change of NCB, the NCB receiving such applications should ensure availability of all the background information in respect of the applicant production and/or system unit, and whether another NCB had denied certification to the applicant for natural certification and whether its previous certification was suspended/withdrawn on account of violations. NCBs should also have a documented system for corroborating the information received from the NCB who had previously certified the client.

- 5.2.2 The NCB should have appropriate provisions in its system for receipt of the following minimum information from the applicant. The NCB's system should also have provision for inspection of additional areas as given below, based on the information received from the applicants for certification:

- a) the NCB and its inspectors should have information of and access to all relevant facilities of natural production and/or system, including accounts and sales related records and other relevant documentation to provide adequate audit trails and traceability of natural certified produce-products and/or system,
- b) the applicant should have a record keeping system adapted to the type of production and/or system that enables the NCB to retrieve necessary information

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and to seek verification of the production, storage, processing, service, purchase and sales,

c) the NCB should have access to and inspect non-natural production and/or services units or units associated by ownership or management to the applicant/client. Inspection and/or Audit stages should include review of such units when there is sufficient reason for doing so, such as production and/or services of the same kind of products and/or management system, etc.

d) where existing, the NCB should have information about the units conducting repackaging, outsource or storage (or other processes) on behalf of the applicants as well as all outsourced activities and processes. The NCB should have a system for inspecting the units where such outsourced activities are carried out on a risk based approach,

e) the applicant should provide complete and accurate information in respect of the above.

5.2.3 The applicant should also inform in detail any scheme of inspection, auditing and testing, which the applicant maintains or intends to maintain for ensuring natural integrity.

5.3 Application review

The NCB's system should have provision for review of information on antecedents of the applicant organizations regarding previous applications made/certifications held by the organization as received at application stage. In case the previous history does not provide the NCB regarding the applicant organization's capability to fulfil certification requirements on a consistent basis, the NCB may reject the application after recording appropriate justification.

5.4 Evaluation

Preparation for evaluation

5.4.1 While assigning evaluators/inspectors for the purpose of evaluation, the NCB should generally ensure that the same inspector is not assigned to one client on a continuous basis. Normally change after one certification cycle is or 3 years is considered appropriate.

5.4.2 The team nominated for the purpose of evaluation/inspection of the applicant should carry out an offsite review of the relevant information received through application process as stated in clause 5.2 and ask for any additional information if necessary. Based on this review, an appropriate plan for evaluation may be drawn up and this should include visits to all processes/facilities/farms and others like

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suppliers of natural/non-natural products and/or system in the neighborhood etc., as applicable. The review should highlight areas for specific investigation at the on-site evaluation. This planning should also include as appropriate sampling strategies and requirements for testing based on review of risk analysis conducted by the client.

- 5.4.3 Inspection/Audit procedures and methods used by the NCB should essentially include, but are not restricted to the following:
- a) visits of facilities, management system, processes, storage units, fields/farms (which may also include visits to non-natural areas when necessary), etc.,
 - b) verification of information provided by the client,
 - c) Identification and investigation of areas of risk to natural integrity,
 - d) Review of records, accounts, sales figures, etc.,
 - e) Sampling and analysis, when necessary,
 - f) Calculation and confirmation of input/output norms/management system datas, production/services estimates, etc.,
 - g) Interview not only with designated responsible persons on the production and/or management sistemi units, but also with other levels of employees like workers, production staff, etc.,
 - h) Verification that changes to the natural standards and to requirements of the NCB have been effectively implemented, when necessary,
 - i) Verification that corrective actions of nonconformities have been taken, when necessary.
- 5.4.4 Additional evaluation activities may become necessary based on the observations made during planning and inspection stages.

Some of the examples are:

- a) in case high risk of mixing of natural and non- natural product such as partial conversion and parallel production and/or system is observed during the inspection, then the NCB should verify whether handling and documentation regarding production or processing, storage, sales and services is well managed and makes clear distinctions between certified and non-certified products and/or management system. In cases where products are not visibly distinguishable, specified measures should be applied production and post-production to reduce the risk,
- b) where a client is natural certified also by other NCBs within the same natural certification scope, the NCB should verify the sales records and records of natural products and/or management system with different natural certification symbols when the same certification scope may be doubly or triply covered under certification and transaction certificates, when necessary in order to prevent the sales of non-natural products and/or services instead of natural products/services.

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Evaluation reporting

- 5.4.5 The report should follow a format appropriate to the type of natural operations inspected/evaluated.

Likewise, the report should cover all relevant aspects of the natural standards and natural certification process and adequately validate the information provided by the client, including:

- a) date and duration of the inspection, persons interviewed, details of processes/fields/farms and facilities visited,
- b) details of the on-site-visit activities including a record of the documents viewed and verifications performed,
- c) evaluator's/Inspector's observations and evaluation of compliance to natural standards and the natural certification requirements,
- d) appropriate recording of the compliance aspects as well as non-conformities, both with details of relevant audit evidences and objective evidence for nonconformities detected.

- 5.4.6 Reports should be designed to allow for elaboration and analysis by the inspector on areas where compliance might be partial, natural standards might not be clear, etc. for ensuring appropriate decision with respect to scope of natural certification. The report and accompanying documentation should provide sufficient information to allow verification that the relevant natural standards have been complied with.

5.5 Certification Decision

The inspector(s) can decide advice

5.6 Certification Documentation

In addition to the certification documentation the NCB may be required to issue natural certificates of inspection for each shipment of natural products and or management system in the format provided by the relevant natural certification requirements. Before issue of such certificates the NCB should verify (through comparison with production estimates and/or physical verification) whether the products listed and quantities included have been produced/prepared by the certified client. In some cases, the NCB may also ask for additional evidences in terms of test reports.

5.7 Directory of Certified Products and/or Management System

The NCB should publish a list of certified, suspended and withdrawn clients on its webpage. The list should be updated periodically and in general not later than 2 weeks after the decision has been taken and not later than two days after a decision of withdrawal of certification of a client has been taken.

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5.8 Surveillance

5.8.1 The NCB should conduct periodic on-site inspections of all certified clients. In respect of natural certification, onsite surveillance assessment at a frequency of at least once per year is generally considered essential. This frequency is also prescribed in some natural certification guides.

5.8.2 In addition, the NCB should have a system and documented procedure for conducting client based risk assessment, which should determine the frequency and type of surveillance activities to be conducted. The system for risk analysis should also be used for determining the number of announced and unannounced inspections. The number of additional and or unannounced inspections per annum should generally represent 10% of the certified clients under the scheme, unless otherwise specified in the natural certification guides.

5.8.3 The following aspects, as minimum should be considered while conducting the risk assessment for each client:

- a) the results of the previous control,
- b) the complexity of the certified client (type and structure of certified client);
- c) quantity of products concerned,
- d) risk of mixing of natural and non-natural product such as partial conversion and parallel production,
- e) intensive production and high dependence of external inputs, short production cycles;
- f) previous track record both with respect to running the scheme as well as rejects from the market, previous NCs, feedbacks, test result etc.; and
- g) complaints/denunciations/alerts received, and/or
- h) management system.

Depending on the risks identified, the NCB should decide whether it is appropriate to increase the frequency of inspections, then those planned in accordance with natural certification guides.

5.8.4 Surveillance activities in respect of the natural production certification guides should include the following:

- a) additional visits to the certified client's premises during the certification period on the basis of a risk-based system,
- b) end product testing for residues, colorant, gas, syrup, additive, GMOs and etc. based on the results of risk assessment.
- c) and/or product testing for residues, allergen, animal DNA, Animal Protein and GMO based on the results of risk assessment for vegan certification,
- d) and/or management system requirements.

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5.9 Changes Affecting Certification

- 5.9.1 In case the NCB makes any changes in the natural certification requirements, then it should ensure, by any means that it chooses, that the information is immediately transmitted to the certified clients and also inform about the transition period for the client to comply with the changed requirements. The transition period should be decided based on the changed requirements and should also take in to account considerations such as the decision regarding the natural products and/or services under production/ already produced before the changes are made known to the client. In case changes are driven by the changes in natural production and/or management system requirements as per the relevant natural certification guides, then the transition period and other production as well as natural certification requirements should take in to account the relevant natural certification guides requirements. The NCB should also require the client to confirm the receipt of the information and his confirmation on following the instructions transmitted.
- 5.9.2 The NCB's procedure should require the natural certified client to inform them in cases of any changes, such as, modification in natural product and/or management system composition, manufacturing process, production practices, extension/reduction in site changes, etc. The NCBs should determine whether the announced changes require further visits and confirmation. The NCB should inform the natural certified client of all conditions under which the client should not release the natural certified product to the market before getting confirmation from the NCB.
- 5.9.3 If the natural certified client outsources parts of production/processing activities to other natural producers, this should be informed to the NCB in advance, allowing the NCB to inspect the same if necessary. In case of outsourcing, the NCB should require the natural certified client to be held fully responsible for the outsourced activities. This should also be made part of the legally enforceable agreement between the NCB and the client. Any further changes in the outsourcing arrangements should be promptly brought to the notice of the NCB.

5.10 Termination, Reduction, Suspension or Withdrawal of Certification

NCBs should have documented procedures for dealing with violation of the natural standards and natural certification procedures by the natural certified clients. These should include requirements for minor deviations as well as major deviations affecting the natural integrity of the natural certified products and/or management system. In case of major deviations affecting natural integrity, the NCB should ensure that the indication of certification is removed from the entire lot of the production run which is affected by the major deviation. Where a serious violation is made by the client, the NCB should withdraw certification from the client. The NCB should have clearly documented procedures for withdrawal and cancellation of natural certificates and natural certification marks, including aspects like product recall, etc. The NCB should also take note of any sanctions, if any, imposed by the

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relevant regulators(i-NAF-NBE Foundation., etc.) on the natural product and/or management system related to alerts issued.

5.11 Records

The NCB should maintain records to demonstrate the natural certification procedures on natural production/management have been effectively implemented. Such records should include but are not limited to:

- a) full description of the management system and/or production unit and/or collection areas, showing the storage and production premises and land parcels and, where applicable, premises where certain preparation and/or packaging operations take place,
- b) information about as the natural certified unit's sub – contractors, if any,
- c) any specific requirements imposed by the respective regulators (NBE Foundation., i-NAF etc.) with respect to information exchange the same should also be complied with.

5.12 Complaints and Appeals

- 5.12.1 The NCB should have a procedure which describes how to deal with complaints received from stakeholders like importers of the certified natural products and/or management system, regulators (i-NAF-NBE Foundation., etc.) and other relevant sources, especially regarding the natural products/services supplied by its certified clients. Response time, responsibilities and the handling procedures including investigation processes should be clearly described. In case the complaint investigation indicates violation of product integrity, then the NCB should decide about undertaking additional or unannounced audits of the client's premises.
- 5.12.2 The NCB should have a system in place that ensures that the clients inform them of any complaints received by them regarding the quality of an natural product/system. The clients should also inform the NCB of the measures taken by them to correct the defects, if any, identified based on their investigation of the complaint received. They should also inform of the measures taken to prevent reoccurrences.

6 MANAGEMENT SYSTEM REQUIREMENTS**6.1 Options**

- 6.1.1 any quality management system, and
- 6.1.2 any environment management system, or
- 6.1.3 any food safety management system, or
- 6.1.4 any halal system practices.

6.2 General Management System Documentation (Option A)

Documents of Article 6.1