

CERTIFICATION TRADE MARK RULES

Piadina Romagnola



Consorzio di Promozione e Tutela della Piadina Romagnola

CLASS	GOODS
30	Flat bread; Bread; all the aforesaid complying with the specifications of the PGI "Piadina Romagnola"

CERTIFICATION RULES FOR THE TRADE MARK PIADINA ROMAGNOLA

1. The requirements that goods must meet

The name “Piadina Romagnola” refers to the typical Romagna’s bakery product obtained from the preparation, and subsequent cooking on a flat pan, of a dough made of flour, fat, salt and some optional ingredients.

When released for consumption, it is disc-shaped and ivory-white in colour with distinctive amber-coloured markings of various sizes and shades on both sides. It has a fragrant flavour and a distinctive smell reminiscent of freshly baked bread.

The distinguishing physical characteristics are:

shape: roundish

dimension:

- diameter from 15 cm to 30 cm
- thick from 2 mm to 8 mm

outer appearance: the surface is rough and irregular, with amber-coloured markings or blisters of various sizes owing to the cooking process.

2. The process for determining whether the goods meet the requirements

“Piadina Romagnola” is a protected Designation of Origin under Commission Regulation EC 1174/2014 for entering a name in the register of protected designation of origin and protected geographical indication.

Council Regulation EC 1151/2012 on protected indications and protected designations of origin of agricultural products and foodstuff, outlines the necessary requirements that products must meet in order to have the prescribed characteristics of “Piadina Romagnola”.

The Consorzio di Promozione e Tutela della Piadina Romagnola (the Consorzio) is responsible for regulating, protecting and promoting “Piadina Romagnola” in collaboration with the Italian Ministry of Agricultural, Food and Forestry Policies (MIPAAF).

BIOAGRICERT is an independent organization responsible for the inspection and certification of “Piadina Romagnola”. BIOAGRICERT is accredited by Italian national accreditation body ACCREDIA and authorized by MIPAAF for the monitoring of products with registered Designation of Origin status.

BIOAGRICERT monitors the production process of “Piadina Romagnola” and oversees each step of the manufacturing process until the certification of the final product.

The Consorzio monitors use of the Certification trade mark “Piadina Romagnola”, and is also responsible for correct labeling and presentation of “Piadina Romagnola” product. The Consorzio verifies the placement of the Certification mark on all “Piadina Romagnola” products.

Monitoring of “Piadina Romagnola” is carried out by supervisors qualified as public security officials on behalf of the Consorzio in collaboration with the Italian Institute of Quality Control and Fraud Repression (ICQRF), Carabinieri Anti-Fraud Units (NAC) and Agri-food and Forestry Units (NAF).

Detailed guidelines for supervision of “Piadina Romagnola”, as well as the manner in which all aspects of “Piadina Romagnola” are to be controlled by the Consorzio, are set out in the Audit Plan. A non-binding translation of the Audit Plan accompanies these regulations. The Audit Plan in Italian language is available on request at MIPAAF.

3. The attributes that a person must have to be an approved certifier to assess whether goods meet the requirements.

An approved certifier must be sanctioned by the following inspection body:

Name: BIOAGRICERT S.R.L.

Address: Via dei Macabracchia n.8/3-5-5

40033 Casalecchio di Reno (BO)

ITALY

Tel +39 051 562158

Fax +39 051 564294

email : info@bioagricert.org

BIOAGRICERT inspectors are qualified and trained for the purpose of certifying “Piadina Romagnola” according to the procedures regulated by the BIOAGRICERT and implemented under Regulation (EC) 1151/2012.

Detailed guidelines for certification, auditing and inspection of “Piadina Romagnola” are set out in the Audit Plan.

4. The requirements that the owner of the certification trade mark, or an approved user must meet to use the certification trade mark in relation to the goods.

Geographical area:

The producers of “Piadina Romagnola” must have production site in the historical territory of the Italian Region of Romagna, and more precisely the entire territory of the Provinces of Rimini, Forlì-Cesena and Ravenna and the following municipalities of the Province of Bologna: Borgo Tossignano, Casalfiumanese, Castel del Rio, Castel Guelfo, Castel San Pietro, Dozza, Fontanelice, Imola, Mordano.

Proof of origin:

Each stage of the production process must be monitored by the inspection body (BIOAGRICERT) in accordance with the monitoring program, all inputs and outputs must be recorded.

This, along with the compilation of specific lists managed by the body, as well as timely notification to the inspection body of the quantities produced, packaged and labelled, ensure product traceability. All natural and legal persons recorded in these lists may be subject to checks by the inspection body, as provided for in the production specification and the monitoring program.

Method of production:

The name “Piadina Romagnola” refers to the bakery product obtained from the preparation, and subsequent cooking on a flat pan, of a dough made of flour, fat, salt and various optional ingredients.

Raw materials:

Compulsory ingredients per 1 000 g of common wheat flour

Common wheat flour;

Water: as much as necessary to obtain a consistent dough;

Salt: less than or equal to 25 g;

Fat: lard and/or olive oil and/or extra virgin olive oil, up to 250 g.

Optional ingredients per 1 000 g of common wheat flour

Raising agents: sodium bicarbonate, disodium diphosphate, corn or wheat starch, up to 20 g.

It is forbidden to add preservatives, flavourings and/or other additives

All the production stages listed below must take place within the identified geographical area:

- preparation of the dough (mixing the ingredients with water until a consistent dough is obtained)
 - portioning (the dough is divided by hand or mechanically into rolls or balls)
 - rolling out (the process of flattening the rolls or balls of dough to form “Piadina Romagnola” is done solely and exclusively by mechanical or manual means)
 - cooking (cooking involves the heat treatment of both sides of the dough disc. The disc may be turned by hand or mechanically)
-
-

- cooling

When released for consumption, it is disc-shaped and ivory-white in colour with distinctive amber-coloured markings of various sizes and shades on both sides. It has a fragrant flavour and a distinctive smell reminiscent of freshly baked bread.

The distinguishing physical characteristics are:

shape: roundish

dimension:

- diameter from 15 cm to 30 cm
- thick from 2 mm to 8 mm

outer appearance: the surface is rough and irregular, with amber-coloured markings or blisters of various sizes owing to the cooking process.

Production and packaging must occur as a continuous process so as to avoid a situation whereby the product loses its texture after cooling. If the product remains in direct contact with the air for a period in excess of its natural cooling period, its specific organoleptic characteristics are impaired and it becomes dry and stale.

“Piadina Romagnola” is sold in food wrapping paper or cloth wrapping for immediate serving, while for consumption at a later time it is sold in sealed and airtight food pouches.

Packaging the product for consumption at a later time in sealed and airtight food pouches not only stops its organoleptic characteristics from deteriorating, it also prevents exposure to external sources of contamination, and in particular to the harmful effects of attacks by flour parasites (particularly the flour moth).

Link with geographical area

Romagna is the easternmost part of the Emilia-Romagna Region. It extends from the Adriatic coast in the east to the border with the Province of Bologna in the west, and from the border with the Marche Region in the south to the border with the Province of Ferrara in the north. It has a temperate, sub-continental climate that varies with altitude and distance from the coast. While the climate of Romagna does not differ greatly from that of the rest of northern Italy, it has its own characteristics owing to the gradual narrowing of the plain.

Historically, the production and consumption of “Piadina Romagnola” spread in Romagna as an alternative to bread, which was available in limited quantities. It thus acquired the definition given to it by Romagna’s celebrated poet Giovanni Pascoli, namely the ‘national bread of the Romagnols’.

The consolidation over the centuries of this tradition and the specific production techniques were the basis for the birth, in the 1970s, of the small-scale commercial production of “Piadina Romagnola” at small outlets (kiosks) for immediate serving.

The widespread and visible presence in Romagna of kiosks producing and selling “Piadina Romagnola” for immediate consumption is a characteristic feature of the territory, well-known to locals and tourists alike. The production of “Piadina Romagnola” packaged for later consumption developed from this.

When preparing “Piadina Romagnola” account needs to be taken of the techniques passed down over time in Romagna, which give the product its typical characteristics. A precise sequence should be followed when mixing the ingredients; the dough should not be worked for too long and it must achieve a consistency allowing it to be laminated. It must be cooked at the right temperature and for the length of time indicated, taking care to turn the disc over on the plan so that the product takes on the peculiar characteristics.

These skills result from the knowledge and long experience of local producers and give “Piadina Romagnola” its distinctive characteristics. These characteristics have remained unchanged since the product’s origins and have allowed it to retain its reputation over time.

“Piadina Romagnola” has an excellent reputation on both the national and international markets, amply demonstrated by its frequent use in countless recipes and the many references to in on web, magazines, and other media. The reputation means consumers immediately recognize the uniqueness and authenticity of the product.

“Piadina Romagnola” has for a long time represented the culture and the history of Romagna region. The product is closely linked to the knowledge, traditions and skills of the Romagnols who have created an exclusive and distinctive product.

Dedicated festivals are held annually by local producers who compare their produce, thereby perpetuating local customs.

5. Other requirements

Labelling



Piadina
Romagnola.

The packaging must bear the mark

The mark may be reproduced in black and white (monochrome) or colored.

Only brown for stylized depiction of a rooster, wheat stalk, circular border, Piadina Romagnola words, and beige inside the circle, are colors allowed.

6. Fees

The Consorzio charges Certified Users of “Piadina Romagnola” a fee in accordance with the Piadina Romagnola PGI fee list approved by MIPAAF. The amount of the fee is determined by the Consorzio and notified to MIPAAF. The fees are intended to cover the costs for promotion and protection activities carried out by Consorzio.

7. Register of Certified Users

The Consorzio maintains a Register of all Certified Users of “Piadina Romagnola”. The list is available for public inspection at www.consorziopiadinaromagnola.it

8. Registration is in the public interest

Use of the certification mark is available to any person or company that complies with these regulations, and trades in the specified goods.

9. The procedure for resolving the dispute about whether the goods meet the certification requirements

Any dispute can be taken up with the following bodies:

Name: Consorzio di Promozione e Tutela della Piadina Romagnola

Address: Piazza Leopoldo Tosi, 4

47923 Rimini

ITALY

Tel. +39 0541 760227

Fax. +39 0541 791734

email: segreteria@consorziopiadinaromagnola.it

Name: Ministero delle Politiche Agricole Alimentari e Forestali (MIPAAF)

Address: Via XX settembre, 20

00187 Roma

ITALY

Tel. +39 06 46655104

Fax. +39 06 46655306

email: qualita@politicheagricole.it

The Consorzio is authorized and supported by MIPAAF to handle any disputes.

Penalties consist of economic reimbursements.

In accordance with MIPAAF guidelines, the Consorzio monitors, protects and safeguards the protected geographical indication (PGI) from abuse, unfair competition, counterfeiting, misuse of the protected name and other unlawful conduct. These activities are carried out thoroughly and effect everyone involved in the production, processing and the marketing stages.

10. The procedure for resolving the dispute for any other issue relating to the certification trade mark

Any disputes can be taken up with the following governmental body:

Name: Ministero delle Politiche Agricole Alimentari e Forestali (MIPAAF)

Address: Via XX settembre, 20

00187 Roma

ITALY

Tel. +39 06 46655104

Fax. +39 06 46655306

email: qualita@politicheagricole.it

The Consorzio exercise controls in combination with MIPAAF.

Any dispute is handled by Consorzio, supported by MIPAAF.

The penalties consist of economic reimbursements.

In this regard, Regulation (EU) 1151/2011 dated 21 November 2011 on quality schemes for agricultural products and foodstuffs, states as follow:

Article 36: Designation of competent authority

1. In accordance with Regulation (EC) No 882/2004, Member States shall designate the competent authority or authorities responsible for official controls carried out to verify compliance with the legal requirements related to the quality schemes established by this Regulation.

Procedures and requirements of Regulation (EC) No 882/2004 shall apply mutatis mutandis to the official controls carried out to verify compliance with the legal requirement related to the quality schemes for all products covered by Annex I to this Regulation.

2. The competent authorities referred to in paragraph 1 shall offer adequate guarantees of objectivity and impartiality, and shall have at their disposal the qualified staff and resources necessary to carry out their functions.

3. Official controls shall cover:

(a) verification that a product complies with the corresponding product specification; and

(b) monitoring of the use of registered names to describe product placed on the market, in conformity with Article 13 for names registered under Title II and in conformity with Article 24 for names registered under Title III.

Article 37: Verification of compliance with product specification

1. In respect of protected designations of origin, protected geographical indications and traditional specialities guaranteed that designate products originating within the Union, verification of compliance with the product specification, before placing the product on the market, shall be carried out by:

(a) one or more of the competent authorities as referred to in Article 36 of this Regulation; and/or

(b) one or more of the control bodies within the meaning of point (5) of Article 2 of Regulation (EC) No 882/2004 operating as a product certification body.

The costs of such verification of compliance with the specifications may be borne by the operators that are subject to those controls. The Member States may also contribute to these costs.

2. In respect of designations of origin, geographical indications and traditional specialities guaranteed that designate products originating in a third country, the verification of compliance with the specifications before placing the product on the market shall be carried out by:

(a) one or more of the public authorities designated by the third country; and/or

(b) one or more of the product certification bodies.

3. Member States shall make public the name and address of the authorities and bodies referred to paragraph 1 of this Article, and update that information periodically.

The Commission shall make public the name and address of the authorities and bodies referred to in paragraph 2 of this Article and update that information periodically.

4. The Commission may adopt implementing acts, without applying the procedure referred to in Article 57(2), defining the means by which the name and address of product certification bodies referred to in paragraphs 1 and 2 of this Article shall be made public.

Article 38: Surveillance of the use of the name in the market place

Member States shall inform the Commission of the names and addresses of the competent authorities referred to in Article 36. The Commission shall make public the names and addresses of those authorities.

Member States shall carry out checks, based on a risk analysis, to ensure compliance with the requirements of this Regulation and, in the event of breaches, Member States shall take all necessary measures.

Article 39: Delegation by competent authorities to control bodies

1. Competent authorities may delegate, in accordance with Article 5 of Regulation (EC) No 882/2004, specific tasks related to official controls of the quality schemes to one or more control bodies.

2. Such control bodies shall be accredited in accordance with European Standard EN 45011 or ISO/IEC Guide 65 (General requirements for bodies operating product certification systems).

3. Accreditation referred to in paragraph 2 of this Article may only be performed by:

(a) a national accreditation body in the Union in accordance with the provisions of Regulation (EC) No 765/2008; or

(b) an accreditation body outside the Union that is a signatory of a multilateral recognition arrangement under the auspices of the International Accreditation Forum.

NON-BINDING TRANSACTION

ONLY THE ITALIAN MIPAAF AUTHENTICATED VERSION IS LEGAL BINDING

AUDIT PLAN
PIADINA ROMAGNOLA PGI (ITALIAN FLATBREAD)

Drafted by AM
Sergi Salvatore

Verified by QAM
Russo Vito

CC APPROVAL

RECIPIENT

Copy delivered to:		Department:
Copies no ____ of ____	Issued on:	Endorsed by QAM:

STATUS OF BIOAGRICERT REVISIONS

MIPAAF approval date	Revision	Reason for revision
01/07/2013	00	First issue
24/01/2014	01	Entry into force of Ministerial Decree 14/10/2013 Art. 12 paragraph 4 transitional protection labelling
28/11/2014	02	Commission Implementing Reg. (EU) No 1174/2014 dated 24 October 2014 registering a designation in the register of protected designations of origin and protected geographical indications: Piadina Romagnola/Piada Romagnola PGI.
13/04/2017	03	Change regarding the communication of data on packaged products to align the request with the data required by the Protection Consortium for the reference periods.

FOREWORD

EC Reg. 1151/2012 requires that the agri-food products that benefit from the PGI designation should comply with a production policy, and the verification of compliance with the regulatory requirements should be carried out by inspection bodies authorised by the member states before the product is released to the market.

This *Audit plan*, drawn up on the basis of Laws, Standards, Regulations and reference documents identified in paragraph 1), contains all the elements that characterise the PIADINA or PIADA product and describes the set of checks which it must undergo in order to be marketed with the protected indication "PIADINA/PIADA ROMAGNOLA PGI".

SCOPE

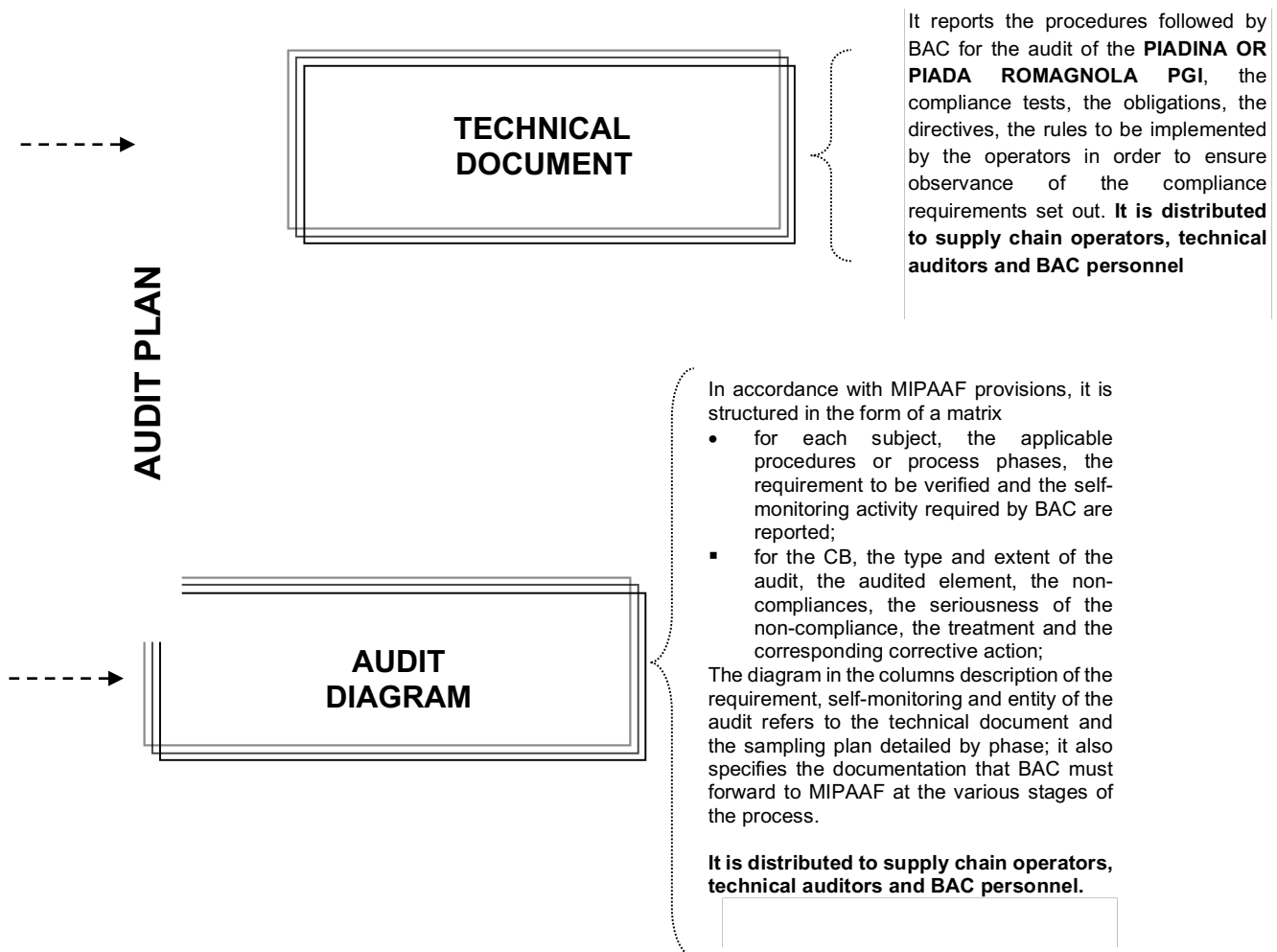
To ensure observance of the compliance requirements set out in the production policy and the audit plan approved by MIPAAF through assessments, audits and tests.

FIELD OF APPLICATION

This Audit plan applies, for the relevant specific parts, to all the operators of the production chain of the "PIADINA ROMAGNOLA PGI".

AUDIT PLAN

The audit plan consists of the technical document and of the audit diagram, according to the following outline.



BIOAGRICERT s.r.l

**TECHNICAL DOCUMENT
PIADINA ROMAGNOLA PGI (Italian
flatbread)**

Rev. 03 of 13/04/2017

**TECHNICAL DOCUMENT
PIADINA OR PIADA ROMAGNOLA PGI**

GENERAL INDEX

1	STANDARDS, REGULATIONS, LAWS AND REFERENCE DOCUMENTS	4
2	TERMS AND DEFINITIONS	5
3	OPERATORS INVOLVED	7
4	PROCEDURES TO ACCESS THE AUDIT SYSTEM	7
4.1	Presentation of the application for membership.....	7
4.2	First membership	7
5	INITIAL RECOGNITION AND DECISION FOR CERTIFICATION	7
5.1	Documentary examination of the first membership application	7
5.2	Initial audits	7
5.3	Audits	7
5.4	Acceptance of the operator in the audit system.....	7
5.5	Label approval, wording placed with the sign of the venue and paper wrappers	8
5.6	Application for authorisation to release for consumption	8
5.7	Proposal, issue and approval of the authorisation to release for consumption.....	8
5.8	Duration of the authorisation to release for consumption	8
5.9	Application for renewal of the authorisation to release for consumption.....	8
6	RECONFIRMATION	8
6.1	Documentary examination of the application for reconfirmation	8
6.2	Failure to send the application for reconfirmation and exclusion from the list of audited operators	8
7	SURVEILLANCE FOR MAINTAINING THE REQUIREMENTS	8
7.1	Surveillance audits	8
7.2	Audit in addition to the ordinary annual audit program	9
8	COMUNICACION OF ANY CHANGES.....	9
9	DISCONTINUATION.....	9
10	UPDATE OF THE LIST OF AUDITED OPERATORS	9
11	READMISSION OF THE OPERATOR TO THE AUDIT SYSTEM.....	9
12	OPERATORS' RECORDS, SELF-MONITORING AND OBLIGATIONS	9
12.1	Pre-packaged product processing companies.....	9
12.2	Processing companies with direct sales	9
13	REGULATORY COMPLIANCE REQUIREMENTS	11
14	PROCUREMENT.....	14
15	SELF-MONITORING OF THE REGULATORY PHYSICAL CHARACTERISTICS.....	14
16	BAC COMPLIANCE TEST PLAN OF THE REGULATORY PHYSICAL CHARACTERISTICS	14
17	MANAGEMENT OF NON-COMPLIANT BATCHES	15
18	IDENTIFICATION AND TRACEABILITY	15
18.1	Pre-packaged product processing companies.....	15
18.2	Processing companies with direct and non-exclusive sales	15
18.3	Processing companies with direct and exclusive sales	15
19	SEPARATION AND COMMUNICATION OF PROCESSING	15
20	TIME TAKEN TO PROCESS THE PAPERWORK	15
21	AUDITS AND DOCUMENT REVIEW	16
22	NON-COMPLIANCES, REITERATION AND RECIDIVISM.....	16
22.1	Non-compliances	16
22.2	Reiteration.....	16
22.3	Recidivism.....	16
23	MANAGEMENT OF NON-COMPLIANCES BY BAC.....	16
23.1	NC management schedule	16
23.2	External reporting of serious NC.....	16
23.3	Cancellation and revocation of the provision	16
24	APPEALS, COMPLAINTS AND LITIGATIONS	16
24.1	APPEALS.....	16
24.2	COMPLAINTS.....	17
24.3	LITIGATIONS.....	17
25	CONSENT TO SUBCONTRACTING AND RIGHT OF OBJECTION	17
26	FAILURE TO PAY BAC	17
27	CONFIDENTIALITY	17
28	ADVERTISING AND TRANSPARENCY	17

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

1 STANDARDS, REGULATIONS, LAWS AND REFERENCE DOCUMENTS

EU Regulation No. 1151 of 21/11/2012	On quality schemes for agricultural products and foodstuffs. It repeals EC Reg. no 509/2006 and 510/2006
Commission Regulation (EU) No 668/2014 of 13/06/2014	Establishing the methods of application of Regulation (EU) no 1151/2012
EC/EU Regulation No. 510 of 20/03/2006	On the protection of geographical indications and designations of origin for agricultural products and foodstuffs
Commission Delegated Regulation (EU) No. 664/2014 of 18 December 2013	It supplements regulation (EU) no 1151/2012 of the European Parliament and of the Council with regard to the establishment of the Union symbols for protected designations of origin, protected geographical indications and traditional specialities guaranteed and with regard to certain rules on sourcing, certain procedural rules and certain additional transitional rules
Law 128-1998 - Community Law 1995-97	With particular reference to Art. 53 as replaced by Art. 14 of Law 1999-526
MIPAAF Note of 30 November 2007 (prot. no 229 66)	Separation of protected designation agri-food products from generic ones
Ministerial Note dated 20/01/2011 Protocol no 0001308	Audit activities in the PDO and PGI sector
Ministerial Note of 05/10/2012 Protocol no 25742	Use of the words "Certified by an Inspection body authorised by MipAAF" on PDO/PGI branded products
Audit plan standard form	Form prepared by MIPAAF approved by the technical assessment group referred to in Art. 14 of law 526/99
ISO/IEC 17025 (November 2000)	General requirements for the competence of testing and calibration laboratories
UNI CEI EN 45011	General criteria for Product Certification Bodies".
UNI CEI EN ISO/IEC 17065:2012	Conformity assessment - requirements for Bodies certifying products, processes and services
Decree 27 December 2012 published in the Official Journal no 13 of 16 January 2013	Temporary protection granted at national level to the designation «"Piadina Romagnola/Piada Romagnola"» for which an application has been sent to the European Commission for its registration as a protected geographical indication (PGI).
M. Decree 14/10/2013	National provisions for the implementation of EU Regulation 1151/2012 of the European Parliament and of the Council of 21 November 2012, on quality schemes for agricultural products and foodstuffs relating to PDO, PGI and TSG.
Commission Implementing Regulation (EU) No 1174/2014 of 24 October 2014	Registration of designation in the register of protected designations of origin and protected geographical indications: Piadina Romagnola/Piada Romagnola PGI.
Provision of 4 November 2014 (OJ no. 271 of 21.11.2014)	Authorisation to the body called "BioAgriCert srl" to carry out inspections for the protected geographical indication "Piadina Romagnola", registered in the European Union

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

2 TERMS AND DEFINITIONS

Label approval and packaging methods	Deed by which BAC, in the absence of a recognised Protection Consortium, assesses compliance with Art. 8 of the product production policy and with the MIPAAF provisions.
Certificate of registration in the list of audited operators	It certifies that the company has been entered in the audit system and that the operator has been registered in the list of audited operators.
Audit activity	Inspection and/or test carried out by BAC
Assessment activities	Document review carried out by the BAC auditor
Self-monitoring	Feedback and documentation activities carried out by the operators of the PIADINA ROMAGNOLA PGI which allows providing objective evidence of observing the compliance requirements specified in the production policy
Corrective action	This refers to the set of actions taken in order to eliminate the causes of existing non-compliances
Competent authorities	They are represented by the MIPAAF (National competent authority) and by the Regional Administrations for the territory of their jurisdiction, in this case the Emilia Romagna Region
Supervisory authorities	Ministry of Agricultural, Food and Forestry Policies (MIPAAF), Emilia Romagna Region and the Central Inspectorate for the protection of quality and fraud prevention of agri-food products (ICQRF)
BAC	BIOAGRICERT srl
Balance sheets of materials	Activities aimed at verifying, by comparison, the compatibility of the incoming and outgoing flows of material
CC	Certification Committee: technical body which is responsible for approving the certification.
CSI	Committee for Safeguarding Impartiality: body that guarantees impartiality
Protection Consortium	Protection Consortium if appointed by MIPAAF in accordance with the provisions of Art. 14 of Law 526-1999
Request for authorisation to be released for consumption	Deed by which BAC authorises the operator to release for consumption the product that observes the regulatory compliance requirements. It is valid for one year.
Production regulatory policy	Document that specifies the mandatory requirements of Piadina Romagnola PGI and the procedure necessary for its production.
Equivalent document	Document prepared by the Processing Companies which reports at least the control, self-monitoring, registration and verification points of the requirements present in the documents drawn up by BAC and approved by MIPAAF.
List of audited operators	List of compliant operators updated annually by BAC.
Material flows	Raw materials, ancillary products, additives, packaging materials which enter the production process at any stage
Protected Geographical Indication (PGI)	It indicates the name of a region, a specific place or, in exceptional cases, a country and is used to designate an agricultural or food product originating in said region, said specific place or said country and of which a given quality, the reputation or other characteristic can be attributed to the geographical origin and whose production and/or transformation and/or processing take place in the specified geographical area.
Batch	Minimum unit with homogeneous characteristics, which has been produced and/or processed and/or packaged under identical conditions.
Batch of compulsory and optional raw materials	Homogeneous quantity of raw material, suitably identified, for which traceability can be ensured.
Packaging batch	Homogeneous batch of finished product to be destined for packaging.
Operator	Natural person or legal entity, located in the production area envisaged by the Piadina or Piada Romagnola PGI regulatory policy, which requests membership of the audit system from BAC.
Audit plan	Document drawn up by an Inspection Body, recognised by MIPAAF; it provides requirements, rules, guidelines or characteristics concerning certain activities or their results
Piadina or piada Romagnola PGI	Product based on common wheat flour with the addition of water, fats, salt, and some optional ingredients obtained according to the requirements of the relevant regulatory policy.
Piadina or Romagna piada alla Riminese PGI	Product based on common wheat flour with the addition of water, fats, salt, and some optional ingredients obtained according to the requirements of the relevant regulatory policy.
Processing company	Operator located in the production area, provided for by the regulatory policy, that produces and packages, or that produces and sells directly both exclusively and non-exclusively, the Piadina or Piada Romagnola PGI wrapped in simple unsealed paper wrappers
Unsealed paper wrappers	Sales unit consisting of a food product and the wrapping in which it is placed or wrapped in the sales outlets.
Pre-packaged food product	Sales unit intended to be presented as such to the consumer and the community, consisting of a food product and of the packaging in which it was placed before being put on sale, wrapped in whole or in part by this packaging but in any case, in such a way that the content cannot be changed without the package being opened or altered.
Initial audit	Audit activity through which BAC ascertains compliance with the requirements of the production policy and with the audit plan for the purpose of registering the operator in the list of audited operators.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
-------------------	---	-----------------------

Requirement	Provision of the production policy that defines the needs to be met and observed in order to comply with it
Trackability	The possibility of reconstructing and tracing the path of a food, intended for food production or of a substance intended or suitable for becoming part of a food through all stages of production, transformation and distribution.
AM	Area manager
Traceability	This refers to the set of procedures prepared by the operator in order to document, for each batch of product, the individual phases of the production process.
Surveillance audit	Audit activity through which BAC ascertains that the requirements, process and product compliance have been maintained, as well as all the obligations specified by the audit plan and the production policy.
Significant changes	Changes that require an additional audit to assess whether the changes that have occurred observe the compliance requirements set out in the audit plan and the production policy.
Operational unit	Site for storage, processing, packaging and distribution of the piadina or piada Romagnola PGI.
Direct and exclusive sale	Processing company that sells directly to the final consumer, in an exclusive way, the piadina Romagnola PGI wrapped in simple unsealed paper wrappers. The wording and logo provided for by Art. 8 must be placed with the sign of the venue.
Direct and non-exclusive sale	Processing company that sells directly to the final consumer, in a non-exclusive way, the piadina Romagnola PGI wrapped in simple unsealed paper wrappers. The wording and logo provided for by Art. 8 cannot be placed with the venue sign but on the unsealed paper wrappers.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

3 OPERATORS INVOLVED

The operators involved in the Piadina or Piada Romagnola PGI and Piadina or Piada Romagnola alla Riminese PGI supply chain are the processing companies.

4 PROCEDURES TO ACCESS THE AUDIT SYSTEM

4.1 Presentation of the application for membership

The request can be drawn up and submitted:

- Directly by the applicant;
- By the Protection Consortium recognised by the MIPAAF, appointed in the name and on behalf of its members.

Should the operator delegate sending its application for membership to the Consortium with a proxy concerning its economic relations too, the latter is required to provide BAC with a statement in which it is clearly stated that the responsibilities deriving from any non-compliance are borne by the applicant. In any case, the request must be signed by the operator. By signing the application for first membership, the operator declares to know and accept the content of the production policy and the audit plan which can be consulted on the website www.bioagricert.org.

4.2 First membership

Operators wishing to join the Piadina Romagnola PGI must send BAC the Form RA_TR_07 duly completed in its entirety, attaching:

- A** Proof of payment of the fixed fee;
- B** Copy of the health authorisation/Commencement note/registration notification Art. 6 EC Reg. 852/2004 and subsequent amendments;
- C** Copy of the Chamber of Commerce registration certificate;
- D** The form, attached to the application for membership, duly completed;
- E** The procedure that defines the operating procedures capable of ensuring, in self-monitoring, the verification of the requirements set out in the production policy.

5 INITIAL RECOGNITION AND DECISION FOR CERTIFICATION

5.1 Documentary examination of the first membership application

Upon receipt of the application, BAC examines the documents within the time limits set out in point 20, to decide whether to accept the application for membership. The following situations can occur from examining the documentation:

Situations	Measure
Application accepted	BAC proceeds as set out in point 5.2 below;
Incomplete application with documents missing	BAC informs the operator with requests for integration, correction and completion of the documents presented.
Application rejected	BAC informs the operator of the reason for rejecting the application

5.2 Initial audits

The initial audit will be planned by BAC within 30 days from the positive assessment of the first membership application. During the initial audit, the auditor in charge:

- A** Assesses the correspondence of what is declared in the application for first membership, the suitability of the operator and the ability to meet the compliance requirements set out in the production policy for the specific activities carried out by the applicants;
- B** Assesses the available documentation;
- C** Reports the deficiencies found and records the results in the audit report of which the operator receives a copy;
- D** Expresses an opinion on compliance;
- E** Delivers the documentation required by the delivery and acceptance form;
- F** Reports the operator's lack of helpfulness and cooperation.

5.3 Audits

Operator	Number of annual audits	Type of audit
Processing company	Minimum 1	Documentary and inspection

5.4 Acceptance of the operator in the audit system

The audit, test (if any) and non-compliance (if any) reports are assessed by BAC.

- **If the assessment is positive**, BAC issues the *Certificate* of registration to the audited operators list within 30 days from the date shown on the audit report sent by the technician to BAC.
- **If the assessment is negative**, BAC communicates the deviations found and the request for adjustment. BAC may carry out an additional audit in order to verify the operator's compliance with the requirements of the production policy.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

Operators who do not have the requirements set out by the production policy are not registered in the list of audited operators. Only registered and eligible operators can submit their application for authorisation to release for consumption.

5.5 Label¹ approval, wording placed with the sign of the venue and paper wrappers

The operator who intends to use labels, paper wrappers in the case of direct and non-exclusive sales, wordings and logos placed with the sign of the venue in the case of direct and exclusive sales, must seek the approval, initially and at each change, of the Protection Consortium if recognised by MIPAAF or of Bioagricert. In addition to the provisions of current legislation and to the production policy, the operator must report the following wording: **“Certified by an Inspection Body authorised by Mipaaf”²**

5.6 Application for authorisation to release for consumption

After having received the *Certificate of registration of the audited operators list*, in order to obtain the authorisation and release for consumption the operator must submit the **Form. RAC_DOP-IGP_07 and the required documents**.

5.7 Proposal, issue and approval of the authorisation to release for consumption

After receiving the application, BAC completes the assessment of the certification dossier and submits the proposal to CC. With the approval, the authorisation to release for consumption is issued.

5.8 Duration of the authorisation to release for consumption

The authorisation issued by BAC is *valid for one year*, provided that the requesting operator continuously maintains the ability to manufacture the product in compliance with the regulatory requirements and does not discontinue the audit system.

5.9 Application for renewal of the authorisation to release for consumption

The new renewal application must be forwarded to BAC, before the deadline indicated on the previously obtained authorisation. Operators included in the audit system must submit the renewal application with the same procedure described in the previous points.

6 RECONFIRMATION

Operators who intend to reconfirm their membership to the audit system and maintain their registration in the list of audited operators must send the application for reconfirmation to BAC by **31 January of each year**: Form RA_TR_07 duly completed, attaching a copy of the payment of the fixed fee.

6.1 Documentary examination of the application for reconfirmation

Upon receipt of the application for reconfirmation, BAC examines the documents in order to verify their compliance with the regulatory requirements. The following situations can occur from examining the documentation:

Situations	Measure
Application accepted	BAC proceeds as set out in point 7 below;
Incomplete application with documents missing	BAC informs the operator with requests for integration, correction and completion of the documents presented;
Application rejected	BAC informs the operator of the reason for rejecting the application.

6.2 Failure to send the application for reconfirmation and exclusion from the list of audited operators

The exclusion from the list can be applied by BAC in cases where an already recognised production entity does not intend to reconfirm their membership with the audit system. If BAC does not receive the application for reconfirmation within the deadline, it will send the operator a preliminary notice notifying the possibility of exclusion. After 30 days without the operator expressing a contrary intention, BAC will exclude the operator from the list of audited operators.

7 SURVEILLANCE FOR MAINTAINING THE REQUIREMENTS

7.1 Surveillance audits

The surveillance aims to ascertain that the Operator continuously maintains the ability to manufacture the product in compliance with the regulatory requirements. BAC carries out a number of audits according to the annual production volume:

Annual production volume of branded piadine	Number of annual audits	Type of audit
---	-------------------------	---------------

¹ The documents approved by BAC show the date of approval and the signature of the technical auditor. Compliance of the indications with the mandatory regulatory aspects is the sole responsibility of the operator.

² Circular no 0000289 of 02/10/2012. It is also specified that the wording may include the reference to the Ministry either by using the acronym Mipaaf, or by quoting the Ministry of Agricultural, Food and Forestry Policies in full.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

Up to 15 t	33% Over the three-year period, operators already previously audited will be audited with a minimum annual share of 33%, to which a 2% share will be added, on a random basis.	Documentary and inspection
>15 t	Minimum 1	Documentary and inspection

7.2 Audit in addition to the ordinary annual audit program

BAC will carry out additional audits in these cases:

- Should it be necessary to ascertain the implementation of the corrective action, provided for in the audit plan, following serious NC;
- The reiteration of NC;
- Audit for late or non-submission of the data after the reminder;
- Should the operator notify significant changes to BAC.

8 COMUNICATION OF ANY CHANGES

Should already documented situations undergo changes (plant changes, equipment, legal requirements, corporate changes, tax data, etc.), operators are required to formally notify BAC within 15 days. For all communications concerning significant changes, BAC will carry out an additional audit at the operator's premises. In the case of non-significant changes, the changes that have taken place will be assessed during the subsequent planned audits.

9 DISCONTINUATION

In case of "discontinuation of the activity", the entity involved is required to notify this to BAC, by sending Form RA_TR_07 and ticking the item **discontinuation**. The discontinuation obliges the operators to:

- A** Immediately suspend marketing the PGI product;
- B** Immediately suspend the use of labels, letterheads and all documents/publications in which references to the PGI and those provided for by EU regulations (PGI Logo) appear.

10 UPDATE OF THE LIST OF AUDITED OPERATORS

The list of operators is updated by BAC on the basis of first memberships, reconfirmations and discontinuations.

11 READMISSION OF THE OPERATOR TO THE AUDIT SYSTEM

All operators who, after the discontinuation of the activity, decide to re-enter the audit system, must submit the application for first membership and repeat **the procedure set out in point 5 of this technical document**.

12 OPERATORS' RECORDS, SELF-MONITORING AND OBLIGATIONS

12.1 Pre-packaged product processing companies

- A** They verify and record in self-monitoring the compliance requirements set out by the production policy;
- B** They record the complaints and the related corrective actions taken;
- C** They record and file the documents required by the audit plan;
- D** They keep all system documentation at the company for at least 5 years from the date of issue;
- E** They send the required documents to BAC;
- F** They guarantee the correspondence between incoming and outgoing quantities, by means of adequate records.
- G** They³ communicate, every four months (**1 January - 30 April; 1 May - 31 August; 1 September - 31 December**) and each time this may be requested by BAC, by sending the packaged products data form (Form. DC_DOP-IGP) or equivalent with the type of package, the kg packaged, the number of packages, the date of packaging
- H** They record the processing, loading, unloading, packaging data and their management on the register (Form RCS_21) or equivalent;
- I** They record the composition and quantities used in the preparation of the dough.

12.2 Processing companies with direct sales

- A** They verify and record in self-monitoring the compliance requirements set out by the production policy;
- B** They record the complaints and the related corrective actions taken;
- C** They record and file the documents for at least 5 years from the date of issue;
- D** They send the required documents to BAC;

³ MIPAAF Circular prot. no. 0001308 of 20/01/2011: Failure to send the data, after the reminder, shall be considered a serious non-compliance only in the event that the subsequent additional audit, which obviously must be activated, detects NCs with the requirements set out by the production policy, or in cases in which it is not possible to ensure traceability.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

- E** They⁴ communicate, every four months (**1 January - 30 April; 1 May - 31 August; 1 September - 31 December**) and each time this may be requested by BAC, by sending the packaged products data form (Form DC_DOP-IGP) or equivalent
- F** They record the composition and quantities used in the preparation of the dough and the regulatory requirements in the register (Form RCS_21) or equivalent.
- G** They provide evidence of the quantity of piadine PGI sold through the management of till receipts and the daily takings book.

⁴ MIPAAF Circular prot. no. 0001308 of 20/01/2011: Failure to send the data, after the reminder, shall be considered a serious non-compliance only in the event that the subsequent additional audit, which obviously must be activated, detects NCs with the requirements set out by the production policy, or in cases in which it is not possible to ensure traceability.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

13 REGULATORY COMPLIANCE REQUIREMENTS



Operators who intend to produce the **PIADINA ROMAGNOLA PGI** or the **PIADINA ROMAGNOLA ALLA RIMINESE PGI** must undergo the audit by BAC and operate in compliance with this technical document, the attached diagram and the production policy detailed below. The auditor verifies compliance with the regulatory requirements.

Art.	Phase	Regulatory requirements	Operators to which these apply
1	Designation	The Protected Geographical Indication (PGI) "Piadina Romagnola" or "Piada Romagnola" is reserved for the bakery product which meets the conditions and requirements indicated in this production policy.	Processing company
2	Product description	The "Piadina Romagnola" or "Piada Romagnola" is a product made from common wheat flour with the addition of water, fats, salt, and some optional ingredients. When released for consumption, the product thus obtained is ivory-white in colour with characteristic amber spots of various sizes and shades on both sides, and with the fragrant flavour and characteristic odour similar to that of freshly baked bread. <u>It can be released to the market for immediate consumption, possibly wrapped in simple unsealed paper wrappers.</u>	Processing company
2	Type of "Piadina Romagnola" or "Piada Romagnola"	The product "Piadina Romagnola" or "Piada Romagnola", ready for consumption, comes in 2 types: A. <u>Piadina Romagnola" or "Piada Romagnola" whose characteristics are:</u> <ul style="list-style-type: none"> - small amber cooking spots on the surface with a homogeneous distribution, - compact, rigid and brittle, - diameter from 15 to 25 centimetres - thickness from 4 to 8 millimetres. B. <u>Piadina Romagnola" or "Piada Romagnola" alla Riminese whose characteristics are:</u> <ul style="list-style-type: none"> - large cooking bubbles on the surface, with an uneven distribution, - soft and flexible, - diameter from 23 to 30 centimetres - thickness up to 3 millimetres 	Processing company
3	Production area	The production area of the "Piadina Romagnola" or "Piada Romagnola" is represented by the following municipalities: Province of Rimini: Bellaria-Igea Marina, Casteldelci, Cattolica, Coriano, Gemmano, Maiolo, Misano Adriatico, Mondaino, Monte Colombo, Montefiore Conca, Montegridolfo, Montescudo, Morciano di Romagna, Novafeltria, Pennabilli, Poggio Berni, Riccione, Rimini, Saludecio, San Clemente, San Giovanni in Marignano, San Leo, Sant'Agata Feltria, Santarcangelo di Romagna, Talamello, Torriana, Verucchio. Province of Forli-Cesena: Bagno Di Romagna, Bertinoro, Borghi, Castrocaro Terme e Terra Del Sole, Cesena, Cesenatico, Civitella di Romagna, Dovadola, Forli, Forlimpopoli, Galeata, Gambettola, Gatteo, Longiano, Meldola, Mercato Saraceno, Modigliana, Montiano, Portico e San Benedetto, Predappio, Premilcuore, Rocca San Casciano, Roncofreddo, San Mauro Pascoli, Santa Sofia, Sarsina, Savignano sul Rubicone, Sogliano al Rubicone, Tredozio, Verghereto. Province of Ravenna: Alfonsine, Bagnacavallo, Bagnara di Romagna, Brisighella, Casola Valsenio, Castel Bolognese, Cervia, Conselice, Cotignola, Faenza, Fusignano, Lugo, Massa Lombarda, Ravenna, Riolo Terme, Russi, Sant'Agata Sul Santerno, Solarolo. Province of Bologna (up to the municipalities marked by the historical course of the Sillaro river): Borgo Tossignano, Casalfiumanese, Castel del Rio, Castel Guelfo, Castel San Pietro, Dozza, Fontanelice, Imola, Mordano.	Processing company
5	Method of obtaining the product Composition and ingredients (from 1000 g of common wheat flour)	<u>Mandatory raw materials</u> Wheat flour; Water: enough to obtain a homogeneous dough; Salt: equal to or less than 25 grams; Fats: lard, and/or olive oil and/or extra virgin olive oil up to 250 grams. <u>Optional raw materials</u> Raising agents: sodium hydrogen carbonate, disodium diphosphate, corn or wheat starch, up to 20 grams; The addition of preservatives, flavourings and/or other additives is prohibited.	Processing company

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
-------------------	--	-----------------------

Art.	Phase	Regulatory requirements	Operators to which these apply
5	Method of obtaining the product Preparation of the dough	The preparation takes place by mixing the ingredients described above with water until a dough is obtained.	Processing company
5	Method of production Sheeting	The process of flattening the dough or balls for forming the piadina or piada romagnola takes place only and exclusively through sheeting. The pastry sheeting process can take place either by conveying the dough directly to mechanical pastry sheeting machines which, by passing through rollers having progressively a narrower "span", form a pastry sheet which is then divided into discs by moulding which is carried out through a special mechanical pressing machine, or by flattening the pat or the ball manually with a rolling pin, or by means of a mixed mechanical sheeter, until a pastry disc with the desired thickness and diameter is obtained.	Processing company
5	Method of production Cooking	Cooking takes place by heat treatment of the pastry disc on both sides. The disc can be turned over either mechanically or manually. The cooking temperatures vary from 200 to 250°C and it stays on the cooking plate up to 4 minutes in total.	Processing company
5	Method of production Cooling down	At the end of cooking, the product is cooled or sold directly. The cooled piadina or piada is placed in bags or heat-sealed bags in modified-atmosphere packaging. For the product to be stored refrigerated and/or frozen, the refrigeration and/or freezing process can be performed both on the single disc of piadina or piada or on packages containing several discs of piadina or piada.	Processing company
5	Method of production Packaging	In order to ensure a uniform moisture content characteristic of the area to safeguard the fragrance of the product, the packaging must take place in the production area indicated in article 3, immediately following the post-cooking cooling, even in the case of the frozen product, in order to ensure its quality, freshness and typical organoleptic characteristics. The use of modified atmosphere and/or the addition of natural ethyl alcohol, up to a maximum of 2% of weight expressed in dry matter, are allowed only in the packaging phase. The packaged "Piadina romagnola" or "Piada romagnola" must show, at the time of its release to the market, the maximum storage terms and conditions detailed below: - for the product stored under refrigeration, 60 days; - for the product stored at room temperature, 90 days; - for the product stored frozen or deep-frozen, 12 months.	Processing company
8	Packaging and labelling	Each package of "Piadina Romagnola" or "Piada Romagnola" PGI must bear the following elements in clear and legible, indelible and clearly distinguishable print: - the Union logo; - the name "Piadina Romagnola" or "Piada Romagnola" followed by the words Protected Geographical Indication, or its acronym PGI; - the logo; - Certified by an Inspection body authorised by Mipaaf. As regards the variant of "Piadina Romagnola" or "Piada Romagnola" alla Riminese referred to in Article 2, it is mandatory to add the indication on the package with clear and legible, indelible and clearly distinguishable identical print to the name "Piadina Romagnola" or "Piada Romagnola", the words "alla Riminese (Rimini-style)" in order to provide greater clarity to the consumer.	Processing company

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
-------------------	--	-----------------------

Art.	Phase	Regulatory requirements	Operators to which these apply
8	Consortium logo		Processing company
	Characteristics of the consortium logo	The stylised image of a rooster and an ear of corn is represented within a circle. Below the circle is the larger wording "Piadina", which overhangs the smaller "Romagnola" wording, all in fancy characters. The colours are Brown 724 C and Beige 728 C.	Processing company
8	Symbol of the Protected Geographical Indication Union Implementing Regulation (EU) No. 668/2014		Processing company
		The logo must be reproduced on the label as required by the annex to Reg. (EC) No. 668/2014 of the Commission of 13/06/2014. As laid down in Annex X, the minimum size of the Union symbols is 15 mm in diameter; however, in the case of small packaging or products, the diameter can be reduced to 10 mm.	
8	Labelling In the case of direct and exclusive production and sale	In the case of direct and exclusive production and sale , the words and logo described above may be placed with the sign of the venue. The characters with which the wording "Piadina Romagnola - PGI" or "Piada Romagnola - PGI" or the other indications provided for by this regulatory policy are indicated, must be grouped in the same field of vision and displayed in a clear, legible and indelible way and sufficiently large to stand out against the background on which they are reproduced so that they can be clearly distinguished from the whole of the other indications and/or drawings.	Processing company
8	Manual production of at least three phases of the production process	Should a production process be adopted that includes the manual production of at least three among the phases of preparing the dough, portioning, sheeting and baking, and in the absence of closed packaging, the wording "traditional manual production" may be added to the Logo with the same font, colour and size as the word "Romagnola".	Processing company
8	Labelling	Other optional indications may also appear on the label to safeguard the consumer and/or information of a nutritional nature in addition to the use of company names and private brands provided they have no laudatory meaning and are not such as to mislead the buyer.	Processing company
8	Labelling For the product destined for international markets	For the product intended for international markets, the term "protected geographical indication" in the language of the country of destination may be used.	Processing company

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
--------------------------	---	-----------------------

14 PROCUREMENT

The Operator must organise the data of the companies supplying the raw materials which it intends to procure, indicating at least:

- The company name of the supplier;
- The address of the supplier's processing plants;

The procedures and the incoming registration systems must allow BAC technicians, during the audits, to verify the traceability of the batches of the mandatory and optional raw materials which will be used in the production of the Piadina Romagnola product and to trace the company name and address of the supplier.

For processing companies with exclusive and non-exclusive direct sales, the provisions of points 18.2 F) and 18.3 H) of this document apply.

15 SELF-MONITORING OF THE REGULATORY PHYSICAL CHARACTERISTICS

Self-monitoring checks on the characteristics of the PGI piadina ready for packaging must be carried out according to the following table. The checks must be recorded and made available to the technician during the audit. The operator must have a procedure that defines the operating procedures capable of ensuring, in self-monitoring, the verification of the requirements set out in the production policy. The procedure will have to be sent to Bioagricert for approval, when the operator sends the request for first membership. **Processing companies with exclusive and non-exclusive direct sales are excluded from setting up the procedure.**

Matrix	Self-monitoring period	Regulatory requirements	Extent of annual self-monitoring
Piadina	After cooking and before packaging	<p>Piadina Romagnola PGI:</p> <ul style="list-style-type: none"> • it must have small amber cooking spots on the surface with a homogeneous distribution; • it must be compact, rigid and brittle; • it must have a diameter of 15 to 25 centimetres; • it must have a thickness of 4 to 8 millimetres. <p>Piadina Romagnola alla Riminese PGI:</p> <ul style="list-style-type: none"> • it must have cooking bubbles on the large surface with an uneven distribution, • it must be soft and flexible, • it must have a diameter of 23 to 30 centimetres • it must have a thickness of up to 3 millimetres 	<p>The frequency in relation to the annual production volume is calculated as follows:</p> <ul style="list-style-type: none"> - 3 times for productions up to 15 tons. of Piadine per year; - 4 times for productions from 15 to 100 tons. of Piadine per year; - 6 times for productions from 101 to 500 tons of piadine per year; - 12 times for productions over 500 tons of piadine per year;

Should situations of non-compliance with the **regulatory requirements** be highlighted, the non-compliant batch must be identified and excluded from the protected circuit. The interested parties must provide evidence of the downgrading, keeping a copy of the documentation regarding the final destination of the product. If the designation has been used on the non-compliant product and this has already been placed on the market, BAC will report it to the Supervisory Bodies (Central Inspectorate for the protection of quality and fraud prevention of agri-food products (ICQRF) and to the Protection Consortium if recognised by the Ministry (MIPAAF).

16 BAC COMPLIANCE TEST PLAN OF THE REGULATORY PHYSICAL CHARACTERISTICS

When released for consumption, the PGI Piadina must meet the characteristics set out in Art. 2 of the production policy.

A Place of verification of the characteristics of the piadina: **processing company**

Matrix	Audit period	Regulatory requirements	Extent of control
Piadina	<p>Sampling of products being processed</p> <p>Sampling in the warehouse of the packaged product</p>	<p>Piadina Romagnola:</p> <ul style="list-style-type: none"> • it must have small amber cooking spots on the surface with a homogeneous distribution; • it must be compact, rigid and brittle; • it must have a diameter of 15 to 25 centimetres; • it must have a thickness of 4 to 8 millimetres. <p>Piadina Romagnola alla Riminese:</p> <ul style="list-style-type: none"> • it must have cooking bubbles on the large surface with an uneven distribution, • it must be soft and flexible, • it must have a diameter of 23 to 30 centimetres • it must have a thickness of up to 3 millimetres 	At each audit

The sampling is performed in accordance with Annex no 1 (sampling for the audit of the PGI Piadina Romagnola regulatory requirements) to this document. For further details regarding the sample preparation, the closure and sealing etc. please refer to IO_03 sampling and analysis, applicable revision.

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
-------------------	--	-----------------------

17 MANAGEMENT OF NON-COMPLIANT BATCHES

If, following the BAC compliance tests and the self-monitoring activities, situations of non-compliance with respect to **the regulatory requirements** should be highlighted, the resulting non-compliant batch must be identified and excluded from the protected circuit with communication to BAC. Interested parties must provide evidence that the product has not been placed in the PGI circuit, keeping a copy of the documentation relating to the final destination of the non-compliant product. If the designation has been used on the non-compliant product and this has already been placed on the market, BAC will report it to the Supervisory Bodies (Central Inspectorate for the protection of quality and fraud prevention of agri-food products (ICQRF).

18 IDENTIFICATION AND TRACEABILITY

18.1 Pre-packaged product processing companies

With reference to the regulatory requirements of the product, the operator must document and record the method adopted to ensure its identification, trackability and traceability, during the phases of:

- A. **Procurement**, in the sense that the operator must trace the batches of mandatory and optional raw materials which will be used in the production of the Piadina Romagnola product;
- B. **Conditioning of the product**, in the sense of allowing the verification of compliance with the regulatory requirements. During the production process, the operators shall identify and record the data that ensure identification and traceability on appropriate documentation;
- C. **Product ready for packaging**, in the sense that the operator must identify the piadina during the cooking, cooling phase and before its packaging;
- D. **Packaging**, in the sense that the operator must identify the finished product with the label which must include all the information required by the production policy
- E. **Marketing and sale of the pre-packaged product**, in the sense that the operator must report, on the tax records, in order to guarantee its traceability, the indication Piadina Romagnola PGI and/or Piadina Romagnola alla Riminese PGI. Furthermore, it must guarantee the correspondence between the quantity produced and the quantity sold through adequate records.

18.2 Processing companies with direct and non-exclusive sales

With reference to the regulatory requirements of the product, the operator must document and guarantee during the phases of:

- F. **Procurement**, in the sense that the operator must keep documentation of the purchases of the *compulsory and optional raw materials* which will be used in the production of the Piadina Romagnola product;
- G. **Non-exclusive direct sale of the non-packaged product**, in the sense that the operator must keep the PGI Romagna piadina separate and identified from other productions. Furthermore, it must guarantee the correspondence between the quantity produced and the quantity sold through suitable documentation (till receipts and the daily takings book).

18.3 Processing companies with direct and exclusive sales

With reference to the regulatory requirements of the product, the operator must document and guarantee during the phases of:

- H. **Procurement**, in the sense that the operator must keep documentation of the purchases of the *compulsory and optional raw materials* which will be used in the production of the Piadina Romagnola product;
- I. **Direct and exclusive sale of the unpackaged product**; in the sense that the operator must guarantee the correspondence between the quantity produced and the quantity sold through suitable documentation (till receipts and the daily takings book).

19 SEPARATION AND COMMUNICATION OF PROCESSING⁵

The operator included in the audit system must guarantee and manage, in the case of processes that involve several production processes for producing products which do not fall within the field of application of the **Piadina Romagnola PGI**, the space-time separation between the different processes, providing proof of this. In particular, **in the event that the productions are spatially separated**, the operators must identify the processing lines, the plants, the premises used for this purpose, notifying BAC. **Should the generic and protected designation productions be, instead, temporally separated**, the operators shall communicate the processing dates and times of the protected productions.

20 TIME TAKEN TO PROCESS THE PAPERWORK

Type of request	Days	Starting from
Request for integration of documentary assessment	10 working days	Request date
Label approval	3 working days	Label shipment date
Certificate issue	10 working days	Within 30 days from the date shown on the audit report
Issue and renewal of the authorisation to release for consumption.	10 working days	Request date

⁵ MIPAAF provisions, official register circular 0022966 of 30/11/2007

21 AUDITS AND DOCUMENT REVIEW

The operator included in the audit system, who carries out a behaviour which aims to not allow audits, or which hinders or hampers the activity of verifying the documents, necessary for the audit activity, is in default. BAC communicates this non-compliance to MIPAAF.

Furthermore, for the purpose of the audit, the operator shall allow BAC:

- Access to all areas assessed, to records and to the personnel involved;
- The participation of BAC observers and of auditors of the Accreditation bodies in the various inspections. These will only assess the work of the Inspection Body.

Furthermore, at the end of the audit, the operator is required to countersign the audit and non-compliance reports, of which he/she receives a copy or summary.

22 NON-COMPLIANCES, REITERATION AND RECIDIVISM

22.1 Non-compliances

There are two levels of non-compliance:

1. **Slight:** failure to satisfy formal aspects of the production process, the self-monitoring system, the management and company documents which does not compromise the compliance of the product with the requirements of the production policy. The product can be identified as PGI";
2. **Serious:** failure to satisfy formal aspects of the production process, the self-monitoring system, the management and company documentation which compromises the compliance of the product with the requirements of the production policy. The product/batch cannot be identified as PGI.

The NCs detected by BAC during the inspections carried out at the operator's premises report the type of NC, the person concerned, the phase to which they apply, the treatment and the corresponding corrective actions according to the provisions of the audit diagram. NC reports are transmitted by the technical auditor to the BAC headquarters which will manage them.

22.2 Reiteration

It means the situation in which an operator, who has committed a specific NC, despite having complied with the provision immediately, repeats the same NC again. This event, repeated for a certain number of times over a period of time, involves the additional measures listed below in the recidivism paragraph. The reiteration mechanism implies that the sum of the NCs is kept active up to a maximum of 24 months for minor NCs and 36 months for serious NCs. Therefore, after this period, NCs committed previously are expired and no longer considered in the count.

22.3 Recidivism

NCs regarding the process

- An additional audit is carried out by BAC after 3 minor NCs, upon detection of the fourth non-compliance of the same type (repetition of the same NC).
- BAC carries out an additional audit after 2 serious NCs upon detection of the third non-compliance of the same type (repetition of the same NC).
-

23 MANAGEMENT OF NON-COMPLIANCES BY BAC

23.1 NC management schedule

The schedule for managing NCs (from the initial reporting to the communication to the interested party) envisages that serious NCs are dealt with within 20 days and minor ones within 60 days. The measures for NCs are considered final 15 days after the communication to the operator, if the latter does not make an appeal, or at the end of the appeal.

23.2 External reporting of serious NC

In case of non-acceptance or of non-submission of the appeal, within 15 days after the communication to the operator, the NC becomes final and subject to report to the MIPAAF. Administrative sanctions are the exclusive responsibility of the Ministry of Agricultural, Food and Forestry Policies.

23.3 Cancellation and revocation of the provision

The cancellation occurs when the operator obtains the review of the provision by means of an appeal, allowing its "total" and retroactive reinstatement (to the date of the provision); the revocation takes place when the operator obtains the review of the provision and its withdrawal, allowing "conditional reintegration" subject to verification of maintaining the certification conditions.

24 APPEALS, COMPLAINTS AND LITIGATIONS

BAC policies and procedures aim to ensure the constructive and timely resolution of disputes and complaints. If these procedures do not lead to an acceptable resolution of the dispute, or if the proposed procedure is not accepted by the opposing party or by other parties involved, BAC provides for the possibility of appealing the decisions taken.

24.1 APPEALS

BIOAGRICERT s.r.l	TECHNICAL DOCUMENT PIADINA ROMAGNOLA PGI (Italian flatbread)	Rev. 03 of 13/04/2017
-------------------	--	-----------------------

Operators can appeal against the measures imposed by BAC **within 15 days** of receipt, detailing the reasons for their dissent and requesting a review of the provision. The appeal must be presented to the BAC Appeals Committee (CRI) which guarantees impartiality and independence of judgment. After assessing the appeal, the Appeals Committee issues a document containing the results of the appeal with the reasons for the decisions taken within 30 days from the date of notification of the appeal by the operator. The possible appeal does not in any case interrupt the enforceability of the measures adopted, until the Appeals Committee decides otherwise. If the appeal is not accepted, the provision becomes final and subject to notification. In case of acceptance, the provision is cancelled or revoked. The expenses related to the management of the appeal, reported in the respective rate tables, will be borne by the losing party.

24.2 COMPLAINTS

Bioagricert's quality policy considers the customers' and consumers' trust in the certification to be extremely important, and therefore has the objective of promptly resolving complaints concerning the products subject to certification. The complaint management is entrusted directly to the BAC Presidency, assisted by the quality office for the technical aspects. The complaint management procedure includes an initial response regarding the handling of the complaint or its rejection, an investigation to identify the causes and possible corrective actions that can avoid the recurrence of the problem that led to the complaint, sending a written communication to the complainant and to all the subjects involved and including the final results of the audits relating to the complaint and the reasons for the decisions taken on the matter. The outcome of the audits and the reasons for the related decisions are issued within 30 days from the date of receipt of the complaint by BAC, with the possibility of a further extension of 30 days in case of justified reasons. Should the opinion of other Control Bodies or subjects involved in the complaint be necessary, the waiting time for external opinions interrupts the set time limits.

24.3 LITIGATIONS

Any dispute relating to the application of this procedure will be resolved by binding arbitration at the Chamber of Arbitration of Bologna's Chamber of Commerce, by an Arbitration Board composed of 3 arbitrators, appointed and operating according to the rules of the aforementioned Chamber of Arbitration. The Board is formed as follows:

- a) Each party appoints an arbitrator. The third arbitrator, who acts as President, is appointed by the two arbitrators designated by the parties, within 15 days of the communication sent to them.
- b) In the absence of the aforementioned appointments, referred to in point a), these will be made by the Technical Committee of the Chamber of Arbitration.

The arbitrators will decide according to fairness, in compliance with the provisions of Articles 806 et seq. of the Italian Code of Civil Procedure. The competent court is that of Bologna.

25 CONSENT TO SUBCONTRACTING AND RIGHT OF OBJECTION

- The audit is carried out by professionals (BAC Technical Auditors);
- The testing is subcontracted to laboratories accredited in accordance with ISO/IEC 17025 standard for the specific tests;
- The operators can object to the technical auditor by sending a written communication containing the reasons to BAC which, if it accepts the reasons, will replace the technical auditor.
-

26 FAILURE TO PAY BAC

Failure to fulfil the financial obligations generates a request for payment by Bioagricert. The request consists in sending the account statement and a letter indicating the amount to be paid and the payment methods. If the operator does not comply with the requirements, Bioagricert notifies the non-fulfilment to MIPAAF.

27 CONFIDENTIALITY

BAC guarantees the maximum professional confidentiality regarding the information and data acquired when carrying out its business. All members (members of the Boards, auditors, managers, employees), as well as all personnel who in any way may have access to the BAC offices (software assistance, cleaning, consultants, etc.) are bound to confidentiality and undertake in writing not to disclose information obtained during their activity. All BAC archives (computer and paper) are adequately protected and with exclusive access to authorised persons. BAC requires the operator's written consent to transfer information to third parties, with the exception of mandatory information to be transmitted to the Competent Authorities and Accreditation Bodies. Should the operator deny the use of personal data, for the purposes of the audit and certification activity, BAC communicates this non-fulfilment to the ICQRF.

28 ADVERTISING AND TRANSPARENCY

BAC publishes all the documents intended for the operator and approved by MIPAAF on the website www.bioagricert.org.

AUDIT PLAN

PIADINA ROMAGNOLA PGI (Italian flatbread)

Delivery and Acceptance Form

I, the
undersigned

as

Manager of the Company

DECLARE TO ACCEPT AND ABIDE BY THE INFORMATION IN THIS AUDIT PLAN AND TO HAVE RECEIVED THE FOLLOWING DOCUMENTS (MARK THE BOX CORRESPONDING TO THE DOCUMENT DELIVERED WITH AN X):

PROCESSING COMPANIES

- AUDITS DIAGRAM
- APPLICATION FOR MEMBERSHIP-RECONFIRMATION-DISCONTINUATION (Form RA_TR_07)
- APPLICATION FOR AUTHORISATION TO RELEASE FOR CONSUMPTION (Form RAC_DOP-IGP_07)
- LOADING AND UNLOADING, PRODUCTION AND PACKAGING COMPANY REGISTER (Form RCS_21_07)
- DATA ON PACKAGED PRODUCTS (Form DC_DOP-IGP)
- CHANGE FORM (Form MM_DOP-IGP)
- COMPLAINTS AND NON-COMPLIANCES COMPANY REGISTER (Form GRNC_DOP-IGP)
- PRICE LIST OF THE PIADINA ROMAGNOLA PGI

Date

Signature of the Company Manager