India Organic
जैविक भारत
Jaivik Bharat

NPOP PROCEDURES 2024

सत्यमेव जयते

DEPARTMENT OF COMMERCE
MINISTRY OF COMMERCE & INDUSTRY
NEW DELHI

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ACCREDITATION PROCEDURE

1. Application for accreditation

(i). Any organization (here in after referred to as 'applicant body'), interested in establishing a certification program under NPOP shall make an application in prescribed format at annexure (Form 1) to APEDA.

(ii). The applicant body shall submit the duly completed Form- 1 online through APEDA portal along with the prescribed fee as notified from time to time. The fee shall be paid online. The NAB shall have the right to revise the fee from time to time. APEDA shall acknowledge receipt of the application within five working days of receiving the same.

(iii) The Applicant body must ensure that they meet the following eligibility criteria prescribed under NPOP before applying for accreditation.

Eligibility Criteria

a. The applicant body should be a Legal Entity registered under applicable law with three years of operation.
b. Have an established registered office in their Country of operation.
c. Have a defined and functional organizational structure with authorities of Management, roles and responsibilities.
d. Adequate arrangement to cover liabilities.
e. Financial status for last three years (balance sheet, ITR etc).
f. Well defined and Functional Quality Management System for operations and implementation of the certification programme.
g. Description of its activities specifically in the field of certification for last three years.
h. Qualified and experienced personnel to perform their roles and functions based on

operational requirements.

i. The entity and its personnel shall be free from conflict of interest.

(iv) The application in Form-1 shall be accompanied by the following documents:

a. the applicant bodies legal status (certificate of incorporation, gazette notification etc) organizational structure, financial status (Audited balance sheet, Income Tax Return etc.) for the last 3 years

b. Geo coordinates and photograph of its office

c. the applicant bodies certification program including the manner of its implementation (MoA etc)

d. Arrangement to cover liabilities (insurance etc)

e. A copy of the operating and quality manual in accordance with the accreditation criteria specified in this chapter;

f. accreditation certificate, if any, obtained from another country or under anyother certification program;

g. document evidencing the officer to sign as authorized signatory and any other relevant information

h. Biodata of its key personnel including executive head, quality manager and inspectors.

(v) On receipt of an application, an application number shall be allotted to the applicant body. The applicant body shall quote the application number in all its correspondence with APEDA.

2. Documentation Review

(i) On receipt of the application, APEDA shall scrutinize the same to determine:

a. whether the application has been made in the prescribed format duly accompanied by supporting documents;

b. The accreditation criteria including three years of operation has been met and

c. whether the policies and procedures of the certification program are in

compliance with the standards laid down in the NPOP policy document.

(ii) The applications wherein basic eligibility criteria have not been met will not be considered for further process. The same will be communicated to the applicant within 30 days of receipt of the application.

(iii) In case of deficiencies observed during prima facie review, the applicant will be intimated within 30 days of receipt of the application. The applicant shall submit additional clarification/documents within 30 days from receipt of the prima facie review.

(iv) After successful completion of the prima facie review, technical review will be carried out which shall be communicated to the applicant within 30 days of completion of prima facie review.

(v) The applicant body will be given an opportunity to submit compliance and additional documents within a maximum period of 30 days from receipt of the technical review report.

(vi) The compliance report/additional information/documents provided shall be evaluated within 30 days of receipt.

(vii) In case some more deficiencies are left out, the applicant body shall be informed in writing and given another 30 days for rectification of the deficiency(s) and resubmission of the second compliance report. In case the applicant body fails to submit second compliance report in 30 days time, application shall be rejected.

3. Physical evaluation/ Onsite audit

(i). If the application is found complete, APEDA shall draw up a Committee comprising of members from the panel of the Evaluation Committee (EC) approved by the NAB. The Evaluation Committee shall carry out the onsite evaluation of the applicant body.

(ii). The applicant body shall be given an advance notice for the physical evaluation by the EC.

(iii). The physical evaluation of the applicant body will comprise of office audit and witness audit to determine if the compliance in accordance with the National Standards for Organic Production (NSOP) and the Accreditation Criteria laid down in the NPOP

document, evaluation of the quality management system, competence and skill sets of its personnel and any other requirement within the scope of the audit. The witness audit will be for assessing the audit skills of the applicant body's inspector(s).

(iv). The office audit shall involve a visit to the applicant body's office to verify the quality management system, files and records pertaining to its certification activities.
The evaluation shall, *inter alia*, include the following:

- Evaluation of the certification program of the applicant body to determine if the same is implemented in accordance with the National Standards for Organic Production (NSOP) and the Accreditation Criteria laid down in this document;
- Evaluation of the quality management system of the applicant body;
- Verify the biodata for qualification and experience of its personnel.
- Verify whether requirements of confidentiality, impartiality and conflict of interest free operations are being met.
- Interview with the applicant body's personnel to assess their competence and
- any other relevant documents as required by the EC.

Thereafter, the EC shall conduct a witness audit on a farm organized by the applicant body for assessing the audit skills of the applicant body's inspector(s).

4. Conformity Report

(i). At the end of the physical evaluation, the Evaluation Committee shall prepare a conformity report containing their observations onsite.

(ii). Two copies of the conformity report shall be duly signed by the authorized officer of the applicant body and the EC members. One copy of the conformity report shall be given to the applicant body and another copy shall be forwarded to APEDA.

(iii) The team leader of the EC shall prepare a detailed evaluation report. The

evaluation report shall comprise, *inter alia*, the findings of the conformity report along with supporting documents as well as the recommendations, if any, of the Committee. A copy of the evaluation report shall be submitted to APEDA within 30 days of the evaluation of the applicant body.

(iv) The applicant body, within a time period of not more than 30 days, shall take corrective actions against the non-conformities listed in the conformity report and submit the compliance report to APEDA.

5. Review of Evaluation Report

(i) APEDA shall review the evaluation report forwarded by the team leader of the EC and on analysis, if any additional deficiencies/ non-conformities are noted, APEDA shall inform the EC of the same.

(ii) Upon review of the compliance report submitted by the applicant body and successful closure of the non-conformities, APEDA shall prepare a detailed assessment report for review by the NAB.

(iii) If the applicant body fails to take corrective measures within the stipulated time frame of 30 days, its application shall be rejected and the application fee shall be forfeited for reasons to be recorded in writing.

6. Review of Assessment Report and Decision by the NAB

(i). The assessment report of the applicant body shall be placed before NAB for review and decision on whether accreditation to the applicant body shall be granted or not.

(ii). The decision of the NAB shall be communicated in writing by APEDA to the applicant body within 15 days from the date of such decision.

(iii). NAB may direct for another evaluation for the verification of additional compliance and/or compliance to the applicable requirements. In such cases, the applicant body shall have to bear such charges as may be decided by the NAB from time to time.

(iv). However, if the applicant is not fully equipped with the organic inspection and certification procedures even after second NAB review, their application will stand rejected

and the applicant shall be allowed to reapply only after completion of three years from the date of such rejection.

7. Grant of Accreditation

The NAB's decision for accreditation of the applicant body as accredited Certification Body shall be granted for a period of three years and only in respect of identified categories of accreditation for which it is competent and qualified under the NPOP.

8. Accreditation contract

Such an accredited Certification Body shall then sign an accreditation contract and code of conduct. The accredited Certification Body shall submit a bank guarantee for an amount as decided by NAB. In case of major non compliances and willful violation by the Certification body, an amount as directed by the NAB will be deducted from the bank guarantee. The accredited Certification Body shall also submit the fee structure leviable on operators for various activities and shall also display it prominently on their website and office site.

9. Certificate of Accreditation

On receipt of the duly executed Accreditation Contract, code of conduct, bank guarantee and tariff structure from the accredited Certification Body, APEDA, on behalf of the NAB shall issue the Certificate of Accreditation to the accredited Certification Body valid for a period of 3 years from the date of issuance of the certificate clearly mentioning the categories of accreditation.

The accredited Certification Body shall ensure to depict the accreditation number on all its certificates and approved labels.

The accreditation granted may be renewed in accordance with the procedure laid down under NPOP.

10. Tracenet - Organic

It will be incumbent upon all accredited Certification Bodies and operators to operate

through APEDA's software called 'TRACENET - ORGANIC', access to which shall be provided by APEDA.

11. Annual Surveillance and Review Evaluations of Accredited Certification Bodies

(i). All the Accredited Certification Bodies under the NPOP shall undergo an annual evaluation / assessment process by the Evaluation Committee.

(ii) The annual surveillance report shall be submitted by the EC to APEDA for review within 30 days of surveillance audit. The same will be placed before the NAB for its information and further directions, if any.

12. Unannounced evaluation

In addition to the annual surveillance visit, within three years of the accreditation period, two unannounced evaluation visits shall be carried out by a two-member team to the accredited Certification Body's office or to any of their operator's premises/farms. Additional unannounced inspections may be carried out in case of complaints and investigations.

13. Renewal of Accreditation

(i). The accredited Certification Body shall submit an application for renewal of its NPOP accreditation along with the prescribed fee, to be received in APEDA 3 months prior to the date of expiry of the accreditation.

(ii). The extension of accreditation for a further period of 3 years shall be subject to evaluation by NAB for compliance with NPOP.

(iii). In the event of major/ repeated non-conformities in the certification programme reported by the EC, NAB shall have the power to reduce the scope of certification or reduce validity period of accreditation or reject the renewal of accreditation for reasons to be recorded in writing.

INSPECTION AND CERTIFICATION PROCESS

The process mentioned in this chapter along with the National Standards for Organic Production (Chapter 3) will cover the requirements to be fulfilled by the accredited Certification Bodies under NPOP for certifying organic operations/operators for different scopes apart from the accreditation requirements mentioned under this Chapter. Certification Bodies shall demonstrate a high degree of competence, consistency and effectiveness in the practical application of these procedures which shall be covered in the operating manual of the accredited Certification Body.

1. Inspection

The accredited Certification Bodies shall follow Standard inspection procedures as per ISO 19011

(i) A qualified and trained inspector shall be assigned to inspect the operations of the operator. Prior to assigning the inspector, the Certification Body shall ensure adequate competence and ensure no conflict of interest of the inspector.

(ii) It shall be ensured that the same inspector shall not visit the same operator consecutively for annual inspection.

(iii) It is clarified that Operators do not have the right to choose nor to recommend inspectors. In case an operator wants to change the inspector, he shall inform the Certification Body, stating the reasons for the same, before the commencement of inspection. The CB shall decide on the request within 3 working days and inform the operator. The decision of the CB shall be final. In case the request for change is not accepted, CB shall specify the reason for its decisions. Such cases will be especially shown to the evaluation committee during audit and also flagged in Organic Tracenet and record kept separately in the software.

(iv) The operators shall have the right to be informed about the identity of the inspector before the inspection visit, and to raise objections related to any potential conflict of

interest.

(v) Sufficient information shall be made available to the inspectors about the operator to allow proper preparation by the inspector. This includes, among others, earlier inspection findings, a description of activities/processes, maps/plans ,product specifications, inputs used, earlier irregularities, infringements, conditions and disciplinary measures.

(vi) The checklists used during the inspection, and the reports emanating from the inspection, shall be comprehensive, covering all relevant aspects of the production standards and shall adequately validate the information provided.

(vii) The inspector shall have access to all relevant facilities, including accounts and other documentation of the operator. This will include access to any non-organic production unit, or units associated by ownership or management.

(viii) The inspector shall take precautionary measures to access the risk of non-compliance during the inspection. When an irregularity is committed by the operator relating to organic production which is a non-compliance to chapter 3 of NPOP, **the entire lot or production affected by irregularity shall be made to be removed from the production site/supply chain and sanctions shall be imposed on the operator.** APEDA shall be informed within 30 days about the action taken on the operator. (Organic Tracenet to have this facility)

(ix) Inspection checklist, reports and inspection shall, follow specified methods to facilitate a non-discriminatory and an objective inspection procedure.

(x) There should be separate inspection checklist and report. (in the app)

(xi) The inspection checklist shall be filled onsite and adequately cover all the first hand observations on site.

(xii) Inspection Reports shall be elaborate with detailed analysis by the inspector on areas where compliance might be partial; standards might not be clear etc.

(xiii) Inspection reports shall give adequate information on the operations of the certified operators including, but not limited to

- Date and time of inspection
- Persons interviewed
- Crops/products requested for certification
- Organic system plan

- Requirements for wild collection (if applicable)
- Fields and facilities visited
- Documents reviewed
- Buffer zones
- Risk of drift
- Risk of contamination
- Inspector's observations
- Calculation of input/output norms, production estimates etc.
- Assessment of production system of operator
- Assessment of the use of logos/approvals (India organic logo, product logo as well as the Certification Body's logo)
- Product reconciliation and verification of stock
- Interview with responsible persons (and summary of discussion)
- Evaluation of compliance to standards and
- Certification requirements.
- Input approval

2. Inspection methods and frequency

(i) The Certification Bodies shall have laid down policy and procedure on inspection methods and frequency which shall be determined by, among others :

- Intensity of production
- Type of production
- Size of operation
- Outcome of previous inspections and the operator's record of compliance
- Any complaints received under NPOP
- Whether the unit or operator is engaged only in certified production
- Contamination and drift risk
- Complexity of production

(ii) An opening meeting will be conducted by the inspectors where in the inspector will

explain the objective and scope of the inspection/audit and the inspection process that will be followed.

(iii) The inspector shall verify the original documents during onsite audit, conduct complete mass balance checks, systematic verification of borders of organic fields for protection against cross-contamination from neighboring fields, inspection of fields, premises and equipment for any signs of use of unauthorized products, appropriate and thorough investigations when signs of use of unauthorized products is observed.

(iv) After the completion of the inspection, an exit meeting will be conducted where in the inspector will explain the findings.

(v) The inspector shall sign the inspection findings, which will have to be countersigned by the operator.

(vi) A copy of the inspection report relating to the certification of the operator's production should be available with the registered operator.

a) Announced Annual Inspections

(i) Inspection of certified operators shall take place at least once annually. This will include inspection of all the facilities/units either owned or contracted by the operator.

(ii) Timing of inspections shall not be so regular as to become predictable.

ii) Apart from annual inspections, additional and unannounced inspections will be carried out by the Certification body based on risk assessment. The Certification body shall have laid down policy and procedure and criteria for additional and unannounced inspection.

b) Additional Inspection

The Certification body shall carry out a minimum of 10% additional inspections annually based on risk assessment.

c) Unannounced Inspections

(i) In addition to annual inspections (100%) and 10% additional inspections, the Certification body shall carry out a minimum 10% (total of annual and additional inspections) of unannounced inspections, based on risk assessment.

(ii) The selection of operators for unannounced inspection shall be based on risk analysis carried out by the Certification Body annually.

3. Risk Assessment

(i) The accredited Certification Body shall have documented procedure for risk assessment of its registered operators covering all scope of activities.

(ii) The risk assessment procedure shall cover the criteria for determining the risk category as high, medium or low.

(iii) The selection of the operators shall be based on the risk assessment and the identified level of risk and shall cover all scope of activities.

(iv) The risk assessment carried out for its registered operators shall be documented and available with the Certification Body for verification.

4. **Analysis and Residue Testing**

(v) The accredited Certification Bodies shall have documented policies and procedures on residue testing, genetic testing and other analysis.

(vi) These policies, must*, interalia*, include:

a) Identification of cases in which samples shall be taken for analysis based on the general evaluation of risk of non-compliance with the organic process.

b) The general evaluation shall take into account all stages of production, processing and chain of custody.

c) The accredited Certification body shall have procedures for risk-based sampling in different stages of crop production.

d) Post sampling procedures and measures to avoid contamination of samples during and post sampling till testing.

(vii) The accredited Certification Body shall take and analyze samples for detecting possible contamination by products not authorized for organic production. The number of samples to be taken and analysed by the accredited Certification Body every year shall be at least 5 % of the total number of operators under its control.

(viii) The accredited Certification Body shall take and analyze samples in each case where the use of products or techniques not authorised for organic production is suspected. In such cases, samples in addition to 5% shall be drawn and tested.

(ix) Samples for analysis and testing should be drawn from the buffer zones where risk of contamination is determined.

(x) Testing to be carried out in ISO 17025 accredited and APEDA authorized laboratories for testing of organic products

(xi) Testing should include a reasonable range of unauthorized substances in the laboratory analyses.

(xii) The accredited Certification body shall ensure that testing is carried out in laboratories accredited for that entire range.

(xiii) For export consignments, testing parameters to be determined as per importing countries requirements.

(xiv) If required, additional testing shall be carried out based on risk or complaints from importing countries as intimated by APEDA.

(xv) Sample should be drawn by trained ~~the~~ laboratory personnel/ certification body inspector.

(xvi) The sampler should also be trained in sampling methodology for drawing during inspections for additional risk based sampling.

5. Inspection of parallel production of farms

If a farm is engaged in parallel production, the certification body through its policy and procedures shall ensure, in addition to the requirements for part conversion, the following:-

- Buffer zones are maintained for demarcation
- Crops are visually distinguishable
- Inspections are carried out at critical times
- Inspection is done in a timely manner
- Risk based testing to be carried out.

- Samples for analysis and testing should be drawn from the buffer zones where risk of contamination is determined.
- Accurate production estimates are available
- The crops are harvested in such away that there are reliable methods to verify the actual harvest of the respective crops
- Appropriate storage capacity exists to ensure separate handling
- The documentation regarding the production is well managed and makes a clear distinction between certified and non-certified production Such a system shall be approved by the Certification Body for each individual operation of the operator.

6.Inspection of processing units

During the inspection of the processing units, the following shall be taken care

(i) The inspector shall verify that sufficient quantities of organic ingredients are used and that organic integrity is maintained through all stages of processing.

(ii) The inspector shall review all ingredients and their sources to ensure that the ingredients meet organic standards.

(iii) The inspector shall also review product formulation to determine if they meet labelling standards.

(iv) Inspectors shall verify the existing record keeping system and evaluate whether it is adequate of tracking organic products.

(v) The inspector shall conduct an audit trail to track the product from receipt of raw material/ingredients, ingredient storage, through all stages of processing, packaging, labelling, warehousing, shipping and sales of the finished product.

(vi) The inspector is required to conduct a complete mass balance check to monitor and maintain the integrity of organic products by accounting for the quantities of organic materials used/produced at each stage of the supply chain.

(vii) It involves tracking the flow of organic raw materials, ingredients, and products to ensure

that the volume of organic inputs matches the output of organic products.

(viii) The inspector shall conduct a sample audit review, which consists of randomly choosing a finished product(s) either from a sales invoice, a product purchased or a product seen in the warehouse. The inspector shall record the Lot Number on the finished product and follow the product back through the record keeping system to the receipt of incoming ingredients. The inspector shall point out the deficiencies if any in the product tracking system.

(ix) The inspector shall inspect all the sub-contracted units/ warehouses annually.

7. Inspections of grower groups

The accredited Certification Bodies shall have clearly laid down policies and procedures for carrying out inspection of grower groups as per the Guidelines for Certification of Grower Groups, given in chapter5.

(i) The external inspection by the Certification Body shall be planned after internal inspections of all the farmers carried out by the Internal Control System (ICS) of the grower group twice annually.

(ii) The Certification Body shall have a standardized format for sourcing the information from the grower groups which shall include list of farmers, location on an area map, year of joining of farmers in the grower group, dates of internal inspections, area of cultivation, crops and yield estimates, sanctions taken for non compliances etc

(iii) The inspector shall

a) Verify existence of ICS office at the location of the concerned grower group
b) Verify availability of all documents, farmer details, internal inspection checklists and reports, procurement records, sale purchase receipts etc at the ICS office
c) verify that the collected information from the ICS with the submitted information by the grower group during registration/renewal.
d) verify maps provided by the ICS and location of the farms and compliance to group certification norms
e) verify that new farmers are included in the group only after the internal inspections are completed
f) verify instances of non-compliances and the measures taken by the ICS including

sanctions

g) carry out the risk assessment of the Grower group

h) draw a sample of farms for visiting the farmers in the Grower group

i) prepare a list of farms of 4 Hectare and above 4 Hectare and shall inspect such farms separately. The 4 Hectare and above farms shall not be included in the sample of farmers drawn for re-inspection.

j) Inspection of the compliance of the organic crop production system of the farmers in the ICS as per organic crop production standards (chapter 3) and further compliance to the grower group certification requirements.

k) Verify farm diary during inspection of sample farmers

l) Conduct a witness audit of the internal inspector for assessing his knowledge and inspection procedures.

m) Crosscheck that the internal control records are incompliance with the findings of the Certification Body's sample inspection results.

(iv) The inspector shall interview the farmers, ICS manager, internal inspectors to assess the knowledge of operator on NPOP standards.

8. Inspection of wild product collection

The Certification Body shall include the following for inspection of wild product collection;

(i) verify that the area of collection is properly identified on appropriate maps issued by the concerned Government Authorities. The map shall be large and distinct enough to reduce the risk of mixing up with non-certified production. However, wherever community rights are recognised under the Forest Rights Act, 2006, Gram Sabha letter can be considered for verification of collection area by the community.

(ii) Verification of operator records of all collectors and the quantities bought from each collector.

(iii) Visit to an appropriate portion of the certified area.

(iv) Visits and interviews of the concerned in the supply chain such as collectors, local agents, landowners and other parties (environment agencies, NGOs etc.)

In case of cultivation by the operators in the forest area recognized under Forest Rights Act 2006, the verification of compliance shall follow the crop production standards given under Appendix1 of chapter 3 of this document.

9. Inspection of all stages in handling

The following applies to inspection of the whole production chain.

(i) Each step in the handling of a product shall be inspected, at least once annually (storage units, packaging, shipment etc).

(ii) Any person who sells a product (raises invoice) shall be registered and certified. This requirement applies until the product is in its final package/has its final label.

10. Inspection of Packed Products

The accredited Certification Bodies are not obliged to have a system for inspection of products that are further handled after being packed in the final consumer package, and/or after issuing of a transaction certificate. The accredited Certification Bodies however, are obliged to take action where there is reason to believe that the standards have been or may be violated at such later stages.

11. Inspection of Storage Facilities

Depending on the kind of storage, the product, packing, prevailing storage practices and the time of storage, inspections shall be required. Accredited Certification Bodies shall conduct a risk assessment to determine future need for inspection for all storage facilities including port facilities.

12. Inspection of Transport Facilities

Transport is not certified as such, but remains under the responsibility of the operator owning the product during the transport including the transport of a product from a warehouse to a processing unit or vice-versa.

13. Inspection of Chain of Custody

Accredited Certification Body shall not issue any license to use its certification mark or issue any certificate for any products unless it is assured of the chain of custody of the product where steps in the production chain have been certified by other accredited

Certification Bodies under NPOP as per the National Standards of Production.

14. Inspection for detection of use of Genetically Engineered Products

Accredited Certification Bodies shall implement a system of inspection for potential use of genetically engineered products. When use of such products is detected at any stage, certification shall not be granted.

When there is a risk of contamination of genetically engineered products, the following samples shall be tested in identified APEDA authorized laboratories.

- seed sand planting stock
- production inputs
- livestock feed
- processing aids
- ingredients

15. Certification

The certification system shall be based on written agreements, with clear responsibilities of all parties involved in the chain of operations for production of a certified product.

The certified operators shall sign contract/agreement with the accredited Certification Body obliging them *interalia* to:

- follow the standards prescribed under NPOP and other published requirements for certification
- accept inspections
- provide accurate information
- inform the accredited Certification Body of any changes
- Maintain timelines for certification including submission of data, compliance to the non-conformities and other certification requirements etc

16. Certification Procedure

The certification procedures shall *interalia* include:

(i) All procedural steps in processing the application until final certification;

(ii) The certification status of all operators and their production be identified throughout the certification process;

(iii) The procedures for extension and updating certification, including certification of individual products

(iv) The operators are required to inform the Certification Bodies of any changes in the organic system plan/ organic production and handling plan.

(v) The Certification Bodies shall determine whether the announced changes require further investigations. In that case, the operator shall not be allowed to release certified products resulting from such changes until the Certification Bodies have notified the operator accordingly.

(vi) The certification decisions be recorded and clearly communicated to the operator;

(vii) Where certification is denied, the reasons shall be clearly stated;

(viii) The certification programme shall be able to impose conditions and restrictions.

(ix) There shall be mechanisms for monitoring compliance with such conditions and restrictions and the same shall be are documented and record maintained

(x) The criteria for the acceptance of applicants, formerly certified by other Certification Bodies shall be documented.

(xi) The renewal process will be initiated three months prior to expiry of the scope certificate.

(xii) The processing of renewal data, inspection, review and certification decision shall be done in a timely manner within three months.

(xiii) The processing of any issue related to violations shall be done with highest priority.

17. Re-certification

i. Certification Bodies shall not re-certify same activity for production, processing and trading units already certified by another Certification Body under NPOP within the validity period of the certificate.

ii. The operators shall not have multiple certifications for the same scope of activity under different certification bodies under NPOP.

18. Certification Decisions

Certification decision will be taken after carefully examining the inspection and review reports. It will not only include approval of operators but also approval of area and products certified, disciplinary measures etc

The accredited Certification Body shall ensure that each decision on certification is taken by a person(s) who is(are) different from those who carried out the inspection and review.

19. Disciplinary measures and sanctions

The accredited Certification Body shall have a clear policy for sanctions and sanction catalogue in the event of non-compliances by the operators.

The accredited Certification Bodies shall have a documented range of disciplinary measures (sanctions) including measures to deal with minor and major infringements of the standards.

The sanction catalogue should have provision for upgrading repeated minor NCs to Major

In case of grower groups, sanction should be applied to the entire group when inspections, based on the representative sample of farmers, show that the ICS has failed in compliance to the grower group certification norms.

20. Withdrawal of certification

The accredited Certification Body shall withdraw certification from the operator for a specified period in case serious non compliances affecting the organic integrity are observed. In case of severe infringement or repeated violations of the NPOP norms, the certification of the operator shall be terminated/ withdrawn.

The Certification body shall inform about their decision to APEDA and shall also publish the same on their website.

Where an infringement that affects the organic integrity is found, the accredited Certification Body shall ensure that the non-compliant lot of production is removed from the entire lot of the production cycle which is affected by the infringement concerned.

21. Appeal against decision of the Certification body

A. First appeal:

The Operator can appeal against the decision of the certification body with 30 days of communication of the decision by the certification body. The appeal shall be disposed off within two months

The certification body shall have policy and procedures for handling appeal by its certified operators against its certification decision.

The CB shall inform the operators of the appeal procedures at the time of certification.

The appellate/ appeal committee shall be independent from the certification activities and free from conflict.

B. Second appeal

If the operator is not satisfied with the decision of the appeal committee of the certification body, it can file a second appeal with the NAB Sub Committee constituted by the NAB for hearing such appeals. The Committee shall ordinarily dispose off the appeal within three months. In case more time is required, the same shall be communicated to the appellant in writing stating the reasons there of for such delay.

22. Procedure for Recertification of terminated operators

In case where certification of an operator has been terminated, the operator can apply for recertification after a period of two years from the date of termination. In such cases, the producers shall not be eligible for reduction in the conversion period upon recertification.

The same or another certification body while recertifying such operators must ensure due diligence and compliance by the operator to the certification requirements.

In case of operators where in certification has been terminated twice, such operators, their directors and promoters shall be debarred from organic certification for five years.

In case it is revealed that the operator/Company, its directors and promoters have changed their identity to register by another identity, strict action as deemed fit by NAB shall be taken.

23. Procedure for re-certification of terminated Operators under NPOP

i. Terminated Operators may apply for fresh registration to the same or another Certification Body (CB) along with full disclosure of past sanctions including termination and period of termination (as applicable).

ii. Certification Body to take note of past sanctions and verify the same from the Certification Body who had imposed the sanction on the operator and also seek details of the non-compliances and decision on sanction.

iii. The Certification Body of the sanctioned operator shall provide all the relevant details to the new Certification Body within a period of 14 working days from the date of receipt of correspondence.

iv. The Certification Body must ensure that the required period of sanction (if applicable) has been completed before certifying a terminated operator. Where termination period has not been specified in the sanction, a minimum period of two years shall be completed before the operator is again certified.

v. The Certification body must ensure due diligence while certifying such cases and ensure thorough verification &onsite audits that past concerns have been duly addressed.

vi. Subsequent to that, the Executive Head of the Certification Body will send a request letter on their letterhead to NPOP Secretariat (APEDA) that they have verified the compliance of the operator and are willing to register and certify the said Operator.

vii. Thereafter, the NPOP Secretariat (APEDA) will examine the request received from the Certification Body for allowing the operator for fresh registration. The decision shall be made in 2 weeks.

viii. The Certification Body will be intimated accordingly.

24. Procedure for shifting of farmers under NPOP

(i) The farmer of a certified grower group can shift to another grower group under the same or another Certification Body in the following cases:

a) If the farmer(s) of a grower group do not want to continue with their existing grower group

b) If the service provider/mandator/trader discontinues his operations, but the farmers under his operations continue organic farming.

(ii) In the above instances, the farmers of the Grower Group who want to shift shall place a request to the ICS of the grower group for applying for No Objection Certificate (NOC) on Tracenet-Organic after fulfilling the exit requirements as per ICS procedures under NPOP. After receiving the NOC application from the Grower Group, the Certification Body after verifying the requirements, will issue the NOC.

(iii) If the Certification Body does not issue NOC to the Grower Group within three weeks of application, the Grower Group can place a request to APEDA. APEDA shall then verify the facts and if satisfied will facilitate the issuance of NOC. The decision of

APEDA in this case shall be final and shall be complied with by the Certification Body, within one week of the date of receipt of the same.

(iv) If the Service Provider of the Grower Group ICS does not forward the NOC request of the farmers on Tracenet- Organic, the farmers can submit a collective request directly to the Certification Body. In such case, the Certification Body shall provide the Tracenet-Organic credential of the grower group to one of the certified farmers (representative farmer) to apply for the NOC.

(v) If the farmers are unable to operate the software themselves, the Certification Body shall facilitate the farmer to apply for NOC on Tracenet- Organic software, on charge of reasonable fee.

(vi) If the service provider of the Grower group ICS does not forward the NOC request of farmers and the Certification Body also does not provide the Tracenet-Organic credential to the representative farmer(s) even after receipt of the collective request from them within three weeks of such application, then the representative farmers may place the collective request to APEDA. APEDA shall then verify the facts and if satisfied will facilitate the issuance of NOC. The decision of APEDA in this case shall be final and shall be complied with by the Certification Body, within one week of the date of receipt of the same.

PROCEDURES FOR GROWER GROUPS CERTIFICATION

1. Grower Groups

Grower Groups are organized group of farmers/producers, farmers' cooperatives etc, who intend to produce organic products engage in organic processes in accordance with the National Standards of Organic Production.

2. Internal Control System

Internal Control System is the control system organized by the member farmers in the grower group to ensure that the NPOP requirements are met by the grower group.

The internal Control System (ICS) of the grower group and an identified person (the ICS Manager) shall be responsible for compliance of the grower group with the NPOP norms.

3. Requirements for Grower Groups

a) The grower group shall have a registered legal entity.
b) The producers in the group must apply similar production systems.
c) The farms should be in geographical proximity.
d) The group shall market its products as a single entity.
e) The grower group shall consist of a minimum 25 and maximum of 500 farmers. For aquaculture the minimum group size is 10. The numbers in the grower group shall be reviewed from time to time by NAB based on performance and compliance of the group to the NPOP requirements and accordingly modified by NAB as deemed fit.
f) Individual farms with land holding of 4 ha (10acres) and above can also be a part of the group but will have to be inspected separately every year by the accredited Certification Body. The total area of such farms shall be less than 50% of the total area of the group.
g) A farmer can be a member of only one grower group.
h) The grower group shall have an Internal Control System (ICS) for implementing the requirements of the grower group certification under NPOP and the NPOP Standards.
i) The ICS will conduct 100% internal inspections of all farmers in the group twice a

year.

4. Documents and records of the Grower group

The internal control system (ICS) of the Grower group will maintain the following documents/records

a) Registration details for legal entity
b) Date of registration
c) Organizational structure
d) Complete details of the grower group members including name, address (location), date of joining the group, land details (organic, in conversion, non-organic), area, crops grown, conversion status, yield estimates, details of collection centres, purchase centres, storage area, previous certification details etc.
e) Application forms of the farmers
f) Contract with the respective farmers
g) Exit forms covering reasons for exit.
h) Updated list of farmers with date of last update
i) Location map of the Grower group depicting the location of the production area/farms.
j) ICS Manual covering detailed operating procedures
k) Internal standards in local language under the framework of NPOP and package of practices
l) Contract with Service provider (if applicable)
m) Farm diaries (available with the respective farmers)
n) Internal inspection records, formats of checklist and report with date and version
o) Date of internal inspections (start and end date)
p) Internal inspection checklist and reports with name of internal inspectors, date etc.
q) Findings of internal inspections
r) Report of External inspection conducted by the Certification body
s) Training records comprising of training schedule, dates of training, list of participants, attendance sheet, course content, training module including pictoral graphics, training videos, trainer, photographs, video etc
t) Sanction Catalogue

u) List of sanctions imposed in case of non-compliance by farmers.

5. Registration of members

i. The farmers desirous of becoming a member of the grower group shall make an application to its ICS. The application format is at **Annex 1**.

ii. The ICS manager will review the application and suitability in terms of location, farming practices, crops etc.

iii. Upon acceptance of the application, the ICS shall register the members as a group under a single legal entity

iv. The grower group members will submit their complete details including name, address (location, land details, area, crops grown, conversion status, yield estimates, storage area, previous certification details etc. (with identity proof).

v. The ICS shall enter into a contract with the farmers. The format of farmers contract with ICS is at **Annex 2.**

vi. The ICS while accepting new members in the grower group including members from other ICS shall inform the accredited Certification Body promptly.

vii. The members of the Grower group should be from the same village/habitation or contiguous village/habitation, to the extent possible. The exception could be for NE States /Himalayan States/UTs.

6. Documents to be provide by the ICS to the members of the grower group

Each member of the grower group will be provided with docket in local languages, which will contain the following:

- Internal standards document in local language. Details and description of the various steps required for the process flow right from cultivation to harvest and sales of the products (Each member / staff shall be communicated when there are vision in the standards.)
- Prevailing farming system and package of practices available for the area
- Farm Diary which should indicate the main crops cultivated, use of inputs, last use of prohibited inputs, farm crop area details, seed and planting materials, crop management practices, contamination control, production and harvested quantities etc. The format for farm diary is at **Annex 3.**

- Schedule of the training programmes.

7. Procedures for exit of the members from the grower group

Any member of the grower group may apply for exit from the grower group by submitting the exit application to the ICS in the format at **Annex 4.**

The exit approval shall only be given once all dues of ICS have been paid/cleared by the member applying for exit.

The reason for the exit should be clearly stated by the farmer and documents by the ICS in writing. The scenario for exit of farmer may be:

a) Joining other grower groups
b) Getting own farm registered as individual processor
c) Moving out of organic cultivation

The ICS shall provide formal exit approval to the exiting operator at the end of the notice period by issuing a NoC on Tracenet -Organic (in case of a and b) or informing Certification for removing the farmer from the group (in case of c) . The exit approval format for a member farmer from a grower group is at **Annex 5.**

The ICS shall intimate their certification body regarding exit of members from the group.

8. OPERATING DOCUMENT – ICS manual

The ICS manager shall prepare the operating document to be followed by all the members of the group in the form of an ICS manual.

The ICS manual shall contain the following:

i. **Location:** An overview map (village or community map) showing location of each member's production unit. The map should indicate the crops cultivated in rotation and also mark any farm in an area, which could be identified as high risk due to drift from non-conventional farms.
ii. **Member details:** Farmer's list with code and name of the farmer, location, total area, area under crop (or number of plants), date of registration with the group, date of last use of prohibited products, date of internal inspection, name of internal inspector, result of internal inspection (separate lists for in-conversion farmers), previous certification details etc.

iii. **Organizational Structure with** roles and responsibilities of its personnel

iv. Procedures for inclusion of members in the group and exit from the group, agreement of the members with the ICS

v. Procedures for internal inspections, internal inspection checklist, sanction procedures, management of parallel and split production, prevention of comingling of produce of organic and non-compliant farmers.

vi. Procedure for risk assessment. The risk assessment shall be carried out by the ICS manager for the grower group annually. The ICS will take all measures to minimize the identified relevant risks.

vii. ICS shall develop a sanction catalogue defining major and minor non compliances and appropriate sanctions thereof.

viii. List of sanctions imposed on the members of the group along with details of non-compliances and duration of the sanction.

ix. Procedure for reinstatement of the farmers upon whom the sanctions have been imposed.

9. Critical control points for risk assessment

i. Measures taken by the farmers to deal with part conversion (if farmers still grow some non-organic crops).

ii. Conversion period

iii. Production rules for the whole production unit, e.g., seeds, fertilization and soil management, pest management, approved inputs, prevention of drifts, animal husbandry.

iv. Harvest and post-harvest procedures.

v. Procurement and handling procedures

10. Internal Inspections

- At least two inspections of the group (one in growing season of each crop) in the calendar year/scope cycle shall be carried out by the internal inspector and will be documented.
- The inspection will be carried out in the presence of the member or his

representative and must include a visit of the whole farm, storage of inputs, harvested products, post-harvest handling and animal husbandry.

- The internal inspector will also verify if the internal standards have been followed and whether the conditions of the previous internal inspection have been fulfilled.
- The visit of the internal inspector will be documented in the farm inspection checklist duly signed by the inspector and counter-signed by the member or his representative. The format for internal inspection checklist is at **Annex 6.**
- In case of serious non-compliances, the results will be reported immediately to the ICS manager and all measures will be taken according to the internal sanction procedures.

11. Internal Approvals

The ICS will have a defined procedure for approval or imposition of sanctions on the farmers in the group. All internal farm checklists shall be reviewed by the approval manager/committee with special focus on the critical control points of risk/difficult cases.

The approval committee for providing internal certification status will check the assessment of the internal inspector. If necessary, conditions will be set out for achieving compliance with the NPOP.

Based on the recommendation of the approval manager/committee, sanctions (as per sanction catalogue) will be imposed on the members for the non-compliances reported in the internal inspection. The format for sanctions by ICS is at **Annex 7.**

12. Buying Procedures

The ICS will follow the following minimum requirements while procuring the produce from the farmers:

1. The status of the farmer in the group should be checked.
2. The supplied amount should be compared with the harvested amount and estimated yield. In case of doubt, the produce is kept apart until clarified by the

ICS manager.

3. The delivered quantity of the product will be registered in the purchase record.
4. Farmer will be issued a receipt duly signed by the purchase officer stating the quantities of the product delivered with date.
5. All documents have to indicate the status of the certified product(organic or in-conversion).
6. Bags should be labeled as ‘organic’ or as ‘in-conversion’.

13. STORAGE AND HANDLING PROCEDURES

The purchase or the warehouse manager during the handling of produce shall check the documents to ensure the compliance with the NPOP standards. The following are the minimum requirements that shall be followed during storage and handling:-

- Identification of the product at all stages of product flow during transition.
- Segregation of organic products from in-conversion products.
- The location in the warehouse during storage must be labeled as ‘organic’ or ‘in-conversion’.

Fumigation of containers, irradiation/ionization, etc. are prohibited.

Annex 1

ICS APPLICATION FORM (for use by the farmer)

To,

The ICS Manager of Grower group
(Quality Manager/Service Provider/Mandator)

Farmer name:	Farmer Code:……
Father's/ Mother's name:	
Village name:	
Farmer address & Contact details	*(To be filled by ICS Office)*
Farm (No. of fields including conventional plots)	
GPS Coordinates (similar on field map) :	
ID proof details :	
Livestock details :	

Khasra No./	Total Area	Organic Area in Hectares	Main crop (Rabi)	Inter Crop Rabi)	Main Crop (Kharif)	Inter Crop (Kharif)	List all the inputs used for organic farming	Irrigation source
Total								

Notes on field situation in organic crop	
Organic holding in field with multiple owners, no clear borders	
All owners are organic	
Field is clearly separated from other fields by	
Storage location:	
Other:(describe)	

Declaration of the farmer

I, the farmer, declare that the information provided above is correct and that I have understood the conditions for Organic Production and ICS rules and I agree to sign the ICS contract.

Date: Signature of farmer:

Place:	
I, the ICS manager, confirm that the above-mentioned information is correct.	
Date: Place:	Signature of the ICS Manager for acceptance

Annex 2

FARMERS CONTRACT WITH ICS

Name of the ICS *and*

Farmers name & Code No.

The ICS shall

1. Be responsible for co-ordinating the project and organic certification from an accredited organic certification body.
2. Advise farmers on the organic farming methods and organize farmer training programmes.
3. Conduct the internal inspections and approval of organic farmers of the group
4. Buy the organic crop at the prevailing market price plus any possible organic premium (depending on market). The ICS shall make the payments within one week of the purchase of the products from the farmer.
5. Address the complaints and appeals of the farmers within reasonable time.

The farmer shall:

1. Undertake organic farming as per the organic standards outlined in the Internal Organic Standard as well as the Internal Control System (ICS).
2. Shall not use any prohibited substances such as pesticides, herbicides or synthetic fertilizers on any crop within the certified organic fields.
3. Use off-farm input only after taking approval from ICS/CB
4. Attend all the training programmes organized by the Internal Control System.
5. Maintain the farm records in the required format.
6. Fulfil the conditions enforced by the internal control system and the accredited certification body.
7. Endeavour to maintain and improve the ecosystem by not cutting trees and burning organic material and littering plastic wastes unnecessarily.
8. Sell the certified products to the Internal Control System only for collective sale as a group and not individually outside the group.

9. In case of any violation of the organic standards in the project, the same shall be reported to the ICS.
10. Accept the sanctions prescribed by the ICS in case of violations of the internal standards by the farmer.
11. Shall allow inspections by persons authorised by ICS and the inspector of the accredited Certification Body and give access to the fields, stores and documents.
12. In case of any changes in production plan, immediately intimate to the ICS Manager

Farmer	*For ICS*
Signature	Signature
Name:	Name Stamp
Place & Date	Date:

Annex 3

FARM DIARY (for ICS) of Grower Group

Name of the Grower Group:
Year of the Current Crop:
Season: Rabi/Kharif/Annual/Others

Name of the farmer_____CodeNo._____

Father's/ Mother's name: _____

ID Proof Details: _____

Farmer address & Contact details _____

Name and address of the farm

Land details (Khasra no,GPS Coordinates etc) _____

Total land(acre)_____No. of farms /plots_____

Year in which organic production was started by the farmer_____

Date of joining of farmer in the Grower Group:_____

Present production technique: Fully chemical /Part organic –split / Part Organic–parallel/

Fully organic/Others Crops under organic production and their area___

_____

Other crops(name and area)_____

Certification Status: Registered ICS/ In conversion/Certified/Others
Name of the accredited Certification Body:_____

Farm Map
Crop Map (Season wise)

Farm-Crop-Area Details:

Name of the crop	Area in Hectares	Year and season of production	Method of production (irrigated, non-irrigated)	Remarks (organic/in-conversion/ others)

Seed & Planting Material:

S No.	Name of the crop	Variety	Purchase date of seed	Name of Supplier & Address	Type of seed (organic, untreated non-organic, treated non-organic)	Seed Treatment(give details)	Quantity of seed (Kg /Ha)

Soil Conditioners & Fertility Input Records:

S No.	Name of farm /plot no	Area	Name of the crop	Name of the inputs	Source of input /brand	Details of application	
						Time	Rate

Record of on farm input (For soil fertility management/ Insect Disease Management)

S No.	Name of Input	Date of input preparation	Details of raw material used	Quantity of input prepared

Disease, Insects, Pests & Weed Management Record:

S No.	Name of farm /plot no.	Area	Name of the crop	Name of pest, disease and weed	Treatment used for control		Source / brand of input	Rate of application
					Name	Time		

Contamination Control Records:

S No.	Chances of contamination	Source & Details	Time of contamination control	Contamination management		Remarks
				Prevention	Control	
	Machinery					
	Water					
	Air					
	Neighbour					
	Drift Control & Buffer Zone					
	Storage					
	Others					

Records of Production & Harvest Details:

Name of farm /plot	Year & season	Name of the crop/produce	Area (Ha)	Estimated production (MT)	Time of harvest	Actual production (MT)

Record of Post Harvest, Handling & Storage Area:

Name of crop	Post harvest treatment (Harvesting, Threshing ,Winnowing, Cleaning)	Name of produce	Packing Material	Storage area

Sale record

Name of The produce	Organic status (Organic/in conversion)	Total output for sale (Kg)	Quantity sold to ICS	Purchase Receipt no. issued by ICS	Balance Quantity	Usage (consumption/ other sues)	Remarks

Dispatch Record:

Name of the produce	Organic status	Quantity sold to ICS(Kg)	Details of transport			Remarks
			Date	Quantity	Mode	

Annex4

APPLICATION FORMAT FOR EXIT OF FARMER FROM ICS

From (Member of Farmer Group under certification)
Name……..
ID Number…….
Address……..

To (The ICS Incharge)
…..……
…….
…….

Dear Sir,

Sub:-Request letter for exit from ICS

I am not interested to continue with the .....(name of the Grower group) under organic certification for the following reasons

……
……
……Hence kindly allow me to exit from the grower group during the renewal of certification of this group.

(strike out the below paragraph if not applicable)
Also kindly forward the details of my certification status as on the date of my exit, to

……who are the new certification body under which Iintended to be certified.

Yours faithfully

Date Signature of the farmer

Annex 5

EXIT APPROVAL FORMAT FOR A MEMBER FARMER FROM A GROWER GROUP

(Letter Head, ICS)

To,
……(Name of Farmer)……
……(ID Number)……..…..
……(Address)……..
……..

Exit Approval

Your application for exit from the grower group has been accepted by the …….(Responsible authority)(name of Grower group).

The details of your certification status as on xx/xx/xxxx is as follows: Name of member :

ID number :

Crops and Status :

Start of Conversion :

Validity of current certification :

The corrective action listed by the approval committee and/or by the internal inspector (if any)
i)
ii)

List of products already sold to ICS and quantity

	Crop	Quantity
1.	xxxxx	xy
2.	zzzzz	zy

Date:

Place:

(for ICS) Signature
(Seal of Grower Group)

Annex 6

INTERNAL INSPECTION CHECKLIST

ICS name:	
Farmer's name	Farmer Organic Tracenet ID
Farmer's Father name:	
Internal Inspector:	Date of Inspection
Village/Taluka/Block/State:	
Farmer Present during Inspection:	GPS Coordinates:

Farm details (all plots, incl. non-organic plots)

Total area	Ha
Organic Area	Ha
Number of plots	

Plot No.	**Area**	**Main crops**	**Inter crops**	**Useof Inputs incl. Seeds (last year)** Product, Quantity, Date	**Yield Estimate (MT)**	**Actual Yield (MT)**
Total Plots						

Check points	**Yes/No/ NA**	**Remarks**
Animal Husbandry		
Living condition of the animals on farm are Acceptable		
Animals fed with organic or non-organic feed		
No medication without veterinary prescription		
Farm and Farm Management		
Whole farm is managed organically (all crops)		

If also non-organic crops: conventional plots clearly separate from organic plots; storage of Inputs is separate		
If also non-organic crops: organic crop is not grown on non-organic plots (no parallel production)		
Seeds and planting material used		
Off farm inputs are Approved /Restricted		
Farmer trained in organic standards		
Farmer aware of internal organic standard		
General assessment of the farm with regard to sustainability		
Burning of crop residues		
Border and prevention of drift		
Weed control		
Pest Management		
Disease Management		
Prevention of erosion		
Cleanliness of the farm		
Implementation of all required activities		
General assessment of crop		
Yield estimate(list the yield estimate of the Current crops)		
Post Harvest Measures and Processing		
Harvesting (no chemicals used, noco-mingling Of the final produce)		
Processing(only allowed ingredients used, no co-mingling/contamination)		
Storage(no co-mingling/contamination)		
Transportation(no co-mingling/ contamination)		

Risk Management

Risk of contamination from	**Low/Med /High**	**Comments**
Neighbouring non-organic fields		
Non-organic activities of same farm		
Industry, motorways, wastewater, etc.		
Others(specify)		
Measure taken to minimize the risk :		

Approval/Recommendations of the internal inspector(whole farm)

Compliance with previous conditions □ good □ partially/acceptable □ missing/not acceptable □ no conditions Last year
Compliance this year □ to approve without conditions □ to approve with conditions □ cannot be approved
Comments by internal inspector

Declaration

The farmer here with confirms that he/she has complied with the internal organic standard and has declared all used inputs activities as stated in this form. The farmer has noted these terms and conditions.	
Date & Signature Farmer	Date & Signature Internal Inspector

Approval Decision *(To be filled by ICS Office)*

Compliance this year □ approved without conditions □ approved with conditions □ not approved
Approval Decision:
Additional conditions or sanctions:
Date & Signature Approval Manager:

Measure taken to minimize the risk

Approval/Recommendations of the internal inspector (whole farm)

Compliance with previous conditions □ good □ partially/acceptable □ missing/not acceptable □no conditions Last year
Compliance this year □ to approve without conditions □ to approve with conditions □ cannot be approved
Comments by internal inspector

Declaration

The farmer here with confirms that he/she has complied with the internal organic standard and has Declared all used inputs activities as stated in this form. The farmer has noted the set conditions.	
Date & Signature Farmer	Date & Signature Internal Inspector

Approval Decision

Compliance this year □ approved without conditions □ approved with conditions □ not approved
Additional conditions or sanctions:
Date & Signature Approval Manager

Annex 7

FORMAT FOR SANCTIONS BY ICS

(Letter Head)

To,

……(Name of Farmer)……
……(ID Number)……..…..
……(Address)……..
……..

List of sanctions and conditions of the approval committee

The following sanctions have been listed by the approval committee based on the internal inspections on xx/xx/xxxx

i) Removal of farmer from the group
ii) Downgrading the organic status to conventional
iii) Sale of farm produce as conventional

The following conditions have to be met by the farmer for maintaining the certification status and continuing with the project

i)…….
ii)……..
iii)…….

You are requested to fulfill the conditions listed at S.No. --------within xx/xx/xxxx and convey the same to the ICS office. The rest of the conditions have to be fulfilled by the next internal inspections.

You may appeal against the sanctions with in a week of receiving this letter. Date:

Place:

(For ICS) Signature

(Seal of ICS)

Grower Group Name/ID

Annex 8

FORMAT FOR DEVELOPING ICS INTERNAL STANDARDS IN LOCAL LANGUAGES

This Internal organic standard is based on the **National Standard for Organic Production**

Condition for admission

- The farmer should be practicing organic farming
- The whole farm has to be converted to organic
- The farmer shall not be a member of any other farmer group certification

Conditions on seeds and planting material

- All seeds/seedlings/planting stock used must be source from organic farms. If no organic seeds and planting material are available, conventional but untreated seeds may be used only for the first year after getting permission from the Internal Control System Manager.
- The farmer shall keep all the empty packets of seeds for inspections.
- No seed treatment with un-allowed inputs shall be done.

Conditions for plant nutrition/fertilization

- Only use of farmyard manure and compost from own farm is permitted for plant fertilization. Other organic inputs can be used only after obtaining permission of the Internal Control System Manager.
- The farmer should undertake crop rotation, green manuring, composting etc. as per the recommendations of the field officer (extension worker) to improve soil fertility.

Conditions for plant protection measures

- The farmers shall undertake necessary preventative methods as per the directions of the field officer for prevention of pests and diseases, which will include choice of crop, varieties & cultural practices etc.
- For plant protection only inputs listed in the approved input list shall be used. In case of necessity, the product will be distributed by the internal control system. The farmer is not allowed to use any off-farm inputs without getting the prior permission of the Internal Control System.
- Only hand and mechanical weeding is allowed for weed control.

Other conditions

- The borders and buffer zones shall be maintained as per the recommendation of the field officer for prevention of drift of unallowed inputs from neighboring farms.
- Measures for prevention of erosion shall be undertaken by the farmers as per the recommendation of the Internal Control System. Such practices shall include measure

like cultivation according to the slopes, planting green barriers, building terraces and earth bundles, etc.

- The crop residues and weeds should not be burned and should be composted or used as mulch
- The farmer shall not store any un-allowed inputs on the farm.
- The farmers shall maintain the farm records in the farmer diary supplied by the Internal Control System of the grower group.
- The farmer shall feed only on farm products to the animals maintained in the farm. The use of off farm products and medication shall be done only after informing the Internal Control System.
- The farm implements should be thoroughly cleaned before use if the implement is borrowed from a conventional farm. It is preferred that the implements be borrowed from an organic farmer only.
- The farmer should attend all the trainings organized for them by the Internal Control System.
- The farmer shall store the harvested produce hygienically and shall use the bags given to them by the ICS for the purpose.

PROCEDURE FOR EQUIVALENCY RECOGNITION AND CONFORMITY ASSESSMENT RECOGNITION WITH TRADING PARTNER COUNTRIES

1. Scope

These procedures shall apply to the equivalency recognition, conformity assessment for accreditation of organic certification bodies between NPOP of India and foreign country organic regulations in respect of organic agricultural certification process and certification of organic agricultural production and processing process and products.

2. Procedure for Equivalency and Conformity Assessment Determination Request

A. Application for Equivalency and Conformity Assessment Recognition

A foreign government's control authority or accreditation authority, seeking equivalence determination or conformity assessment to NPOP, shall send a formal request letter on official letterhead of the foreign Government's Competent Authority to :

The Chairman
Agricultural and Processed Food Products Export Development Authority (APEDA)
NCUI Building
3 Siri Institutional Area, August Kranti Marg New Delhi- 110016
Email: chairman@apeda.gov.in

The formal request letter should be signed by the Departmental head of the applicant Authority. The language of the application shall be English.
The application shall include the following information:

1) The competent authority's contact person(s) and contact information.
2) The legal basis for the foreign government's technical requirement(s), and

conformity assessment system.

3) The scope of the requested determination, (eg. All agricultural products, livestock products, crop products);
4) A detailed side-by-side comparison between the foreign government's technical requirements and those set forth in the NPOP organic regulations.
5) Detailed documentation supporting the foreign government's position, where the technical requirements differ, its technical requirements meet or exceed the NPOP organic regulations; and
6) Detailed documentation explaining the foreign government's conformity assessment program:
    a. The documentation should address the conformity assessment program's:
        i. Legal authority
        ii. Documented specifications or procedures; and
        iii. Compliance and enforcement process and procedures.

    b. The documentation shall be sufficient to demonstrate the foreign government's ability to:
        i. Identify and evaluate the degree of non-compliance related to the technical requirements.
        ii. Investigate non-compliances to determine what corrective or enforcement action are necessary.
        iii. Issue corrective or enforcement actions in cases of violations.
        iv. Monitor implementation/ closure of corrective or enforcement actions; and
        v. Accurately and in a timely manner communicate with its regulated entities.

B. Review of the request of the foreign government for equivalency and conformity assessment recognition

i. APEDA shall examine the documentation for completeness of the application and inform the applicant in case additional information is required.

ii. Once the application is complete along with the supporting documents, APEDA shall conduct a detailed document review to determine the compliance of the foreign country's standards with NPOP regulation for determination of the equivalence arrangement or conformity assessment of accreditation procedures.

3. Procedure for standards comparison

The applicant country shall fill out the comparative table in accordance with the following instructions:

S. No.	Item	Standard of NPOP	Equivalent Provision Of applicant country	Assessment					Remarks if any
				Equivalent	Not Equivalent	Additional	Omitted	Undecided	

a) For "Equivalency Recognition Standards", use published document of National Programme for Organic Production of India chapter-wise and clause wise and compare with the corresponding clause in the regulation of the applicant country.

b) For "Equivalency Recognition Standards (Applicant Country)", use the latest Acts and subordinate Statutes of the applicant country.

c) For "Assessment", may tick the applicable option and provide additional comments (if required) under remarks.

4. Determination of the equivalency and/or conformity assessment recognition

i. Upon completion of the desk review and determination of compliance of both the regulations, APEDA will constitute an audit team comprising of members from APEDA and FSSAI to conduct an onsite audit of the applicant authority of the foreign government, their certification bodies and certified operators to verify the compliance of the conformity assessment system to that of NPOP for equivalency recognition.

ii. Observations of the onsite audit and draft report/outcome of the audit are communicated to the trading partner.

iii. The NAB will review the compliance report. Thereafter, APEDA will notify the findings of the onsite audit to the applicant authority of the foreign government.

iv. The applicant authority shall be provided with 60 days time to submit their responses to APEDA's findings for determination of the recognition agreement.

v. After finalization of the onsite audit report, the same shall be placed before the NAB.

vi. In case NAB is of the view that restriction or conditions for equivalency recognition are deemed necessary after the verification process, APEDA will inform the applicant authority on the restriction/ conditions required for the recognition agreement.

vii. Following approval of the NAB, the text of Mutual Recognition Agreement shall be finalized and intimated to DoC for Concurrence and political clearance of MEA.

Chairman APEDA will communicate the equivalency determination of NPOP to the foreign government by letter.

The letter will recognize the foreign system and will include at a minimum the following:

i. The scope of agricultural products covered under the determination;
ii. The obligation to notify APEDA of any changes in the technical requirements and/or conformity assessment system that may affect the original determination of equivalence;
iii. The obligation to provide APEDA with information regarding corrective or enforcement actions imposed on certifying agents by competent authority;

iv. The obligation to cooperate with APEDA to the extent possible, when notified in advance, with any NPOP inspections and audits' and

v. In the case of a limited equivalence determination, the obligation to adhere to any limitations or restrictions regarding the use of certain methods, procedures, processes, or substances in products to be sold, labelled, or represented as organic in India.

The equivalence determination may include additional obligations on a case by case basis.

APEDA may discuss with the applicant foreign government authorities on the following issues:

i. Fulfilment of obligations by the governments of the two countries specified in the equivalency agreement;
ii. Modifications of the equivalency agreement, following the revision of the equivalency recognition standards of the two countries;
iii. Other matters which are deemed necessary by APEDA and the foreign government authority that has signed an equivalency agreement;

5. Peer Evaluation for continuance of the Recognition Agreement

Continuance of the recognition agreement will be based on the peer evaluation of the applicant authority of the foreign government with prior intimation to determine continued compliance to the scope and obligation of the Recognition agreement. The frequency of the peer evaluation shall be determined during mutual agreement between the two countries.

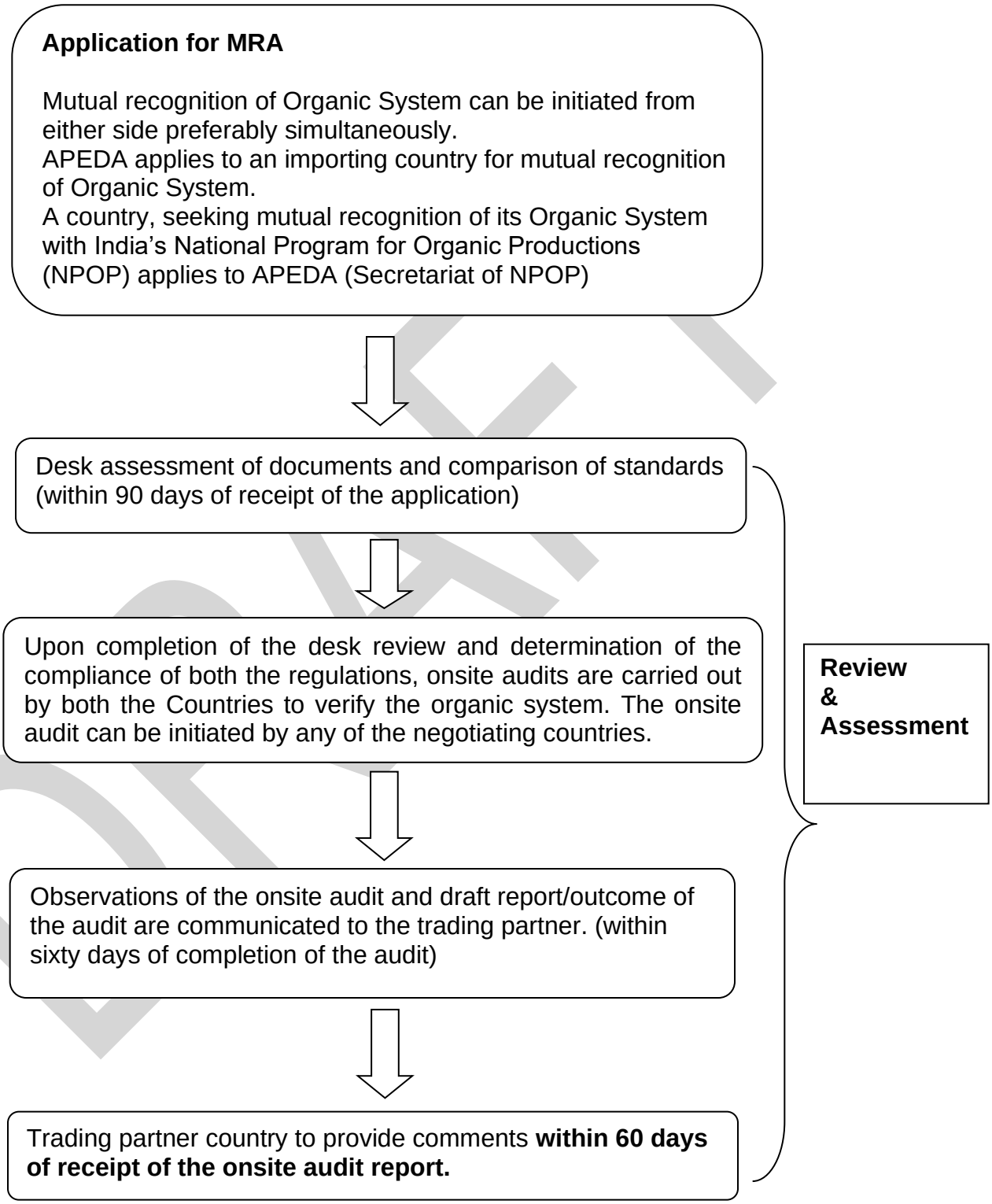
6. Exemptions/ exceptions in Equivalency Recognition Standards

Where any differences arise in respect of equivalency recognition standards during the course of equivalency verification, the relevant standards may be assessed as equivalent,

i. a difference arises in a specific item of the equivalency recognition standards of NPOP set to maintain and conserve domestic agricultural conditions in consideration of the characteristics of the domestic agricultural conditions, such as water, soil, husbandry practices and use of some inputs, additives or processing aids;

ii. the equivalency recognition standards of the applicant country correspond to the equivalency recognition standards generally adopted in the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods of the Codex Alimentarius Commission (CAC) or the standards of the European Commission and or USDA

STEPS FOR MUTUAL RECOGNITION AGREEMENT (MRA) WITH TRADING PARTNERS



Finalization of the onsite audit report incorporating comments of the trading partner (30 days from receipt of the comments)

Corrective action on the observation of the onsite audit, follow up and compliance. (60 days from final report)

Placing the report before the National Accreditation Body (NAB India).

Review & Assessment

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The Agreement Process

- The text for Mutual Recognition Agreement (MRA) is mutually finalised.
- Intimation to DoC for Concurrence and Political clearance from MEA
- Official communication through Embassy, exchange of approved letters & Memorandum of Understanding for mutual recognition.
    - Signing of the MRA.

Implementation of the MRA

- Drafting of the notification procedures for initiation of trade based on MRA.
- Agreement on procedures by both the trading partners.
- Notification of the procedures by both the trading partners for commencement of commercial trade under the MRA.

Peer evaluation for continuance of the recognition agreement.

- Continuance of the recognition agreement will be based on the peer evaluation conducted by both the trading partners with prior intimation to determine continued compliance to the scope and obligation of the Recognition agreement.

- The frequency of the peer evaluation shall be determined during mutual agreement between the two countries.