

1- **Purpose:** To establish and maintain a procedure, for handling the complaints related to operator's certification

2- **Scope:** Complaints regarding operation and/or procedures, Complaints regarding the auditors, reviewers, certified operator; Complaints regarding the misuse of certificates and certification marks (India organic logo or any other such logo that may come into effect from time to time)

3- **Related Document:** NPOP & ISO17065

4- **Responsibility:** Product Head , Quality Manager, Reviewer, External Expert if required.

5- **Procedure:**

Any person or body against the following can make a Complaint:

- Operation and/or procedures
- The auditors, reviewers and other related person
- Certified operator
- Misuse of accreditation or certification status either in scope or in use of the logo or mark

a) **Receiving, validating & recording of complaints:**

The complaints can be received on website, through e-mail, by post, by hand or by any other possible means of communication. Generally, following types of the complaints are received:

- Complaint against the certified operator – Compliance, Labelling, Detection of chemical residue etc.
- Complaint against Eurofins Assurance India Private Limited.
- Complaint against the employee of Eurofins Assurance India Private Limited.

The decision on acceptance of a complaint lies with the Director in agreement with Quality manager, Product Head or certification Manager. The person who takes this decision must be independent in relation to this complaint. After receiving the complaints, Eurofins Assurance India Private Limited will be responsible for gathering and verifying all necessary information to validate the complaint. Eurofins Assurance India Private Limited sends receipt for receipt of complaints and /or protest within 48 hours. Incomplete complaints are not processed or addition information is sought from the complainant to process it. After acceptance of complaint, Director or Quality Manager assigns the complaint handling.

After receiving the complaint, the Eurofins Assurance India Private Limited confirms whether the complaint relates to certification activities that it is responsible for and, if so, shall deal with it. If the complaint relates to a certified operator, then examination of the complaints shall consider the effectiveness of the certified Operation.

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Any complaint about a certified operator will also be informed to the concerned operator at an appropriate time, which can be a week to three weeks, depending on the severity of the complaint.

Cases involving certification decisions of other certification agencies will be referred to those agencies. All other matters will be investigated and decided by the Director who will determine appropriate subsequent action.

Quality Manager shall register the complaint on the Complaint Form- OG-FM-601-66 and provide this form to the person handling the complaint.

b) Investigation of complaints against certified operator

Investigation of complaints against certified operator can include unannounced audit, investigation audit, sampling, or any other method intended to assess the veracity of the complaint. The procedure to address a complaint will be as follows:

- When a complaint has been received, the Director along with certification manager, reviewer and Quality Manager evaluate the complaint (Persons investigating the complaint should not be involved in operation under investigation).
- The decision to be communicated to the complainant will be made by or reviewed and approved by individual(s) not previously involved in the subject of the complaint.
- A log of complaints will be maintained in a way that will allow tracking and recording; it will also include actions undertaken to resolve them.
- Whenever possible, Eurofins Assurance India Private Limited will acknowledge receipt of the complaint within 48 hours, and will provide the complainant with progress reports and the outcome.
- The corrective actions taken will also be verified for their effectiveness.
- Eurofins Assurance India Private Limited will evaluate the complaints relating to customer by reviewing records of previous audits or if necessary, re-auditing the certified operator, by conducting the special/ surprise audit.
- During the investigation of Complaint, if a non-compliance is confirmed, the non-compliance

procedure for certified operations will be followed:

1. If certification cannot be continued for a certified operation based on a review of information received from or about the operation, Eurofins Assurance India Private Limited will provide a written notification of noncompliance to the certified operation including:
 - A description of each noncompliance
 - The facts upon which the notification of noncompliance is based

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- The date by which the certified operation must correct each noncompliance and submit supporting documentation of each such correction when correction is possible.
- 2. The notification will inform the certified operation that they may respond by:
 - Correcting noncompliance and submitting a description of the corrective actions taken with supporting documentation;
 - Correcting noncompliance and submitting a new application to another certifying agent, which includes a complete application, the notification of noncompliance received from the first certifying agent, and a description of the corrective actions taken with supporting documentation or
- 3. The notification will also inform operators about proposed suspension if no corrective actions are taken in given timeline.
- 4. After issuance of a notification of noncompliance, Eurofins Assurance India Private Limited will:
 - Evaluate the applicant's corrective actions and supporting documentation or the written and then conduct an on-site audit if necessary.
 - Issue the applicant a written notice of noncompliance resolution and an approval of certification, when the corrective action is sufficient for the applicant to qualify for certification.
 - Issue the applicant a written notice of proposed suspension certification when the corrective action is not sufficient for the applicant to qualify for certification.
 - Issue a written notice of suspension of certification to an applicant who fails to respond to the notification of noncompliance.
 - Provide notice to the Director APEDA that certification has been granted or denied.
- 5. When correction of a noncompliance is not possible, a notification of noncompliance and a notification of proposed suspension or withdrawal of certification may be combined in a single notification.

If complaint about detection of chemical residue in consignment handled by certified operator is received then the Certification manager will check the traceability of the product in question. If it is evident that the product in question was handled by the certified operator then the Certification manager will temporarily suspend the certified operator immediately and issue a Notice of Temporary Suspension. Certification manager will also provide a copy of Investigation Report to the operator and will plan

an investigation audit to verify the facts about chemical residue detection. No certification will be suspended unless Eurofins Assurance India Private Limited has

- Served at least 7 days written notice to the certified operator, from the date of notification, stating the grounds for the suspension; it will be informed through Notice of Proposed Suspension.
- Considered any written appeal from the certified operator received during this period.
- If no response is received from certified operator in this time period then a Notice of Suspension will be issued to the certified operator, from the date of notification asking the operator to take corrective actions and revert within 21 days.
- If still no response is received from the certified operator, then a last Notice of Proposed Withdrawal of Certification of 1 week is issued.
- The certified operator must reply within the defined period. He should mention the proposed corrective action & the time limit to accomplish it.
- The corrective actions taken by the certified operator will also be verified for their effectiveness.
- Certified operator should inform about the closure of the complaint to Eurofins Assurance India Private Limited.
- Eurofins Assurance India Private Limited will give formal notice of the end of the complaints handling process to the complainant.
- Eurofins Assurance India Private Limited will determine, together with the certified operator and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.

c) Denial of the Certification:

- During initial audit of the project, if it is noticed that certain NPOP requirements are not fulfilled and are beyond corrections within certain timeframe then it may lead to denial of the certification for that project.
- Denial of the certification can also occur if the client does not respond to Notice of Non-compliance along with corrective actions against non-compliances noticed during initial audit.
- The certification manager will inform the client about this through Notice of Denial of Certification.
- The client may take corrective actions in such cases and apply for the certification by submitting fresh application for certification.

d) Temporary Suspension of the Certification

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- Temporary suspension of the certification can occur in following cases:
 - i. Non-confirmation of the audit date for renewal of certification.
 - ii. Occurrence of the chemical residue in organic product sample drawn during the audit or Complaint from third party about the chemical residue in organic product consignment dispatched from your project.
 - iii. No positive response to Notice of Non-compliance along with corrective actions against non compliances noticed during renewal audit.
 - iv. No positive response to Notice of Proposed Suspension in case of any valid complaint against the project.
- Before issuing a Notice of Temporary Suspension, the certifier must issue a Notice of Proposed Suspension and give time period of 7 days to the client to respond. A notice of proposed suspension will include:
 - i. The reasons for the proposed suspension,
 - ii. The proposed effective date of such suspension,
 - iii. The impact of a suspension.
- In case of temporary suspension, the client will get the time of 21 days to respond to Notice of Temporary Suspension. Upon review of response from the client, certification manager can decide to lift the temporary suspension or continue it. In case, the certifier decides to continue temporary suspension, the certifier will issue a Notice of Proposed Withdrawal of Certification.

e) Withdrawal of Certification

- If Eurofins Assurance India Private Limited has reason to believe that a certified operation has wilfully violated the regulations, Eurofins Assurance India Private Limited shall send the certified operation a notification of proposed withdrawal of certification of the entire operation.
- Withdrawal of the certification can also occur in following cases:
 - No positive response to the Notice of Temporary Suspension within given timeline.
 - Repeated chemical residue cases
 - Forgery of the NPOP Certificate or Transaction Certificate
- A notice of proposed withdrawal of certification will include:
 - The reasons for the proposed withdrawal,
 - The proposed effective date of such withdrawal,
 - The impact of a withdrawal of certification and
 - The right to file an appeal to quality manager or APEDA.

- If the certified operator does not appeal against the proposed withdrawal of certification then the certification manager will issue a Notice of Withdrawal of Certification.
- All such withdrawals must be informed to APEDA in writing.

f) Misuse of Certificates and Certification Marks (India Organic Logo or Any Other Such Logo That May Come into Effect from Time to Time). The following instances of misuse of a certificate or mark of conformity may occur:

- Reference to certification in a manner that infers product certification.
- Incorrect reference to the certification system.
- Reference to a certificate or use of a certification mark after the expiry of the certification or after the cancellation, suspension or withdrawal of the certification.
- Reference to a certificate or use of a mark (India Organic Logo or any such other mark) indicating coverage of an organisation or product line or activity that is outside the scope of the certified management system

These instances may be detected during surveillance visits and/or through complaints. The Regulations governing the use of the Mark clearly define the conditions under which the certificate and the marks may be used. In any case of misuse, Eurofins Assurance India Private Limited. reserves the right to take suitable legal action.

g) Regarding the Eurofins Assurance India Private Limited Employee:

Complaint regarding the Eurofins Assurance India Private Limited employee (related to organic certification scheme) will be handled by Project Head. If an employee is found violating the confidential policy and do not respect the code of conduct, appropriate action will be taken as Eurofins Assurance India Private Limited COI policy.

6- Records:

1	Audit Report Investigation Report - OG-FM-601-47	5 Years
2	Complaint Form - OG-FM-601-66	
3	Onsite Audit Checklist - OG-FM-601-48	5 Years
4	Onsite Audit Checklist for Grower Group - OG-FM-601-49	5 Years
5	Onsite Audit Checklist for Wild Collection - OG-FM-601-50	5 Years
6	Onsite Audit Checklist for Processing - OG-FM-601-51	5 Years
7	Onsite Audit Checklist for Trading - OG-FM-601-52	5 Years
8	Exit Interview Sheet - OG-FM-601-53	5 Years
9	Non-conformity Report - OG-FM-601-54	5 Years
10	Secondary Technical Review Report - OG-FM-601-55	5 Years

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11	Technical Review and Certification Decision - OG-FM-601-56	5 Years
12	Risk assessment For Crop production – Individual Farmer - OG-FM-601-57	5 Years
13	Risk assessment For Crop production – Grower Group - OG-FM-601-58	5 Years
14	Risk assessment For Wild Collection - OG-FM-601-59	5 Years
15	Risk assessment For Input Attestation - OG-FM-601-60	5 Years
16	Risk assessment For Processing - OG-FM-601-61	5 Years
17	Risk assessment For Trading - OG-FM-601-62	5 Years
18	Risk assessment of Operator - OG-FM-601-63	5 Years
19	Certification Decision - OG-FM-601-64	5 Years
20	letter of Certification - OG-FM-601-65	5 Years

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