

1- Purposes:

This policy establishes the steps that are required to be taken for protecting organic integrity.

2- Scope:

This policy is applicable to all organic certifications.

3- Reference: NPOP standard**4- Responsibility:** Product Head, Certification Manager, Auditor, Reviewer.**5- Procedures:**

Eurofins Assurance India Private Limited categorizes noncompliance as major and minor based on the severity. Major and Minor noncompliance can be described as following

❖ **Minor Noncompliance** – Noncompliances that do not affect the integrity of the certification process and are rectifiable. Examples of such minor noncompliances include, but are not limited to, failure to submit information on time, improper document & record submission, etc. Minor issues, whether found in operational practices or recordkeeping, indicate no systemic failure in the design or implementation of the organic system plan of all the scopes (Crop Production Individual Farmer, Grower Group, Processing, Trading, Wild collection and Input Approval) i.e they do not show an inability to comply with the NPOP standards. Certification can be granted or continued before correction, but correction must occur within the time period. Eurofins Assurance India Private Limited grants certification which includes requirements for the correction of minor noncompliances within a specific time period as a condition of continued certification.

Certification can be granted along with the notification to the operation, typically a “minor issue letter or along with the certification letter” describing the noncompliance. Eurofins Assurance India Private Limited requires correction during a specific period that can be no later than prior to the next inspection or annual update. Eurofins Assurance India Private Limited keeps written records of the issues identified and their corrections.

❖ **Major Noncompliance** – Noncompliance affects the integrity of the organic standard in general and the certification process in particular. Examples of such major noncompliances include, but are not limited to, noncompliance with organic standards, knowingly providing false information/ documents, misrepresentation as to the certification status, repetition of same nonconformities, and failure to rectify such non compliances, etc. In case of the

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issuance of warning letter, suspension letter, withdrawn letter, termination letter and if any irregularities found in any lot, Eurofins Assurance India Private Limited shall communicate the infringements to the APEDA on immediate basis. In case of serious infringement of the NPOP standard is noticed by Eurofins Assurance India Private Limited. Eurofins Assurance India Private Limited in such cases will take the disciplinary action by removing the entire lot from trade.

S.NO.	Observations / Findings	At level	Sanction
1.	Applicant for certification is not able to comply or is not in compliance with the requirements of standard.	Contracting	Denial of certificate
2.	In case of Providing false information regarding certification	Contracting	If contracted/certified by us, termination of contract/ withdrawal of certificate
3.	Deviation from the system plan in which Practices and/or procedures described in system/management plan are not followed	System Plan	Major; if repeated leads to suspension.
4.	Deliberate use of non-authorized products / substances including GMO or its derivatives	Crop Production	Major; if repeated leads to suspension Downgrade the product if already sold & withdrawal of transaction certificate; Block related products in stock Re-start of conversion period
5.	Use of off farm inputs (plant propagation material, soil inputs, products for plant pest/disease control) without prior approval	Crop Production/Input	Major Status Downgrade
6.	Parallel production without adequate demarcation, crops not distinguishable, inaccurate production estimates, no clear separation during harvesting, handling and storage	Crop Production	Major Status Downgrade of Product
7.	Insufficient Biodiversity or biodiversity not maintained	Crop Production	Minor; if repeated Major NC & then suspension.

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8.	Inadequate measures to prevent accumulation of heavy metals and other pollutants.	Crop Production	Major; Extension of conversion period.
9.	Steps not taken to optimize the soil fertility management practices, in maintaining desired PH level and in minimizing nutrient losses.	Crop Production	Minor; if repeated Major NC & then suspension.
10.	Preventive Cultural techniques not adopted to control pests, diseases and weeds	Crop Production	Minor; if repeated Major NC & then suspension.
11.	Found practicing prohibited practices without notice to CB	Crop Production	Major; Extension of Conversion period or Suspension.
12.	Inadequate measures to conserve soil and water resources	Crop Production	Minor; if repeated Major NC & then suspension.
13.	Collected products exceeds the sustainable yield of ecosystem or threatens the existence species	Wild Collection	Major; Warning letter
14.	Products collected from outside of the scope area or designated collection area	Wild Collection	Major Down gradation of the product
15.	Products collected from unidentified collectors	Wild Collection	Major Down gradation of the product
16.	No clear roles and responsibilities of ICS staff	Grower Groups	Minor; if repeated Major NC & then suspension.
17.	Insufficient ICS staff to manage the ICS	Grower Groups	Major; may leads to suspension.
18.	No written declaration by ICS personnel Available on conflict of interest or no mitigating measures in place to avoid possible conflicts.	Grower Groups	Major; if repeated then suspension.
19.	No clear policies and procedures for implementation of ICS	Grower Groups	Major; may leads to suspension.
20.	Internal standards not developed as per standard requirement	Grower Groups	Minor; if repeated Major NC & then suspension.

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21.	Documents not supplied to registered farmers with listing the contents in local language	Grower Groups	Major; may leads to suspension.
22.	Risk assessment not performed; inadequate risk assessment or management by ICS	Grower Groups	Major; may leads to suspension.
23.	Internal approval/sanctions not followed as per ICS procedure/standards	Grower Groups	Major; may leads to suspension.
24.	Lack of reliability and effectiveness of ICS	Grower Groups	Major / Suspension
25.	Internal inspections criteria not met as per standards	Grower Groups	Major; Suspension or Withdrawal if no action taken on time
26.	Yield estimation not carried out at critical stage (harvesting) and/or counter-checked with estimation.	Grower Groups	Major; If no action taken then yield to be considered as zero.
27.	Inclusion of new farmers without completion of internal inspection	Grower Groups	Major; Extension of conversion period.
28.	Training not provided for ICS staff/farmers	Grower Groups	Minor; if repeated then major and suspension.
29.	ICS staff and farmers lack of knowledge on organic practices and standards	Grower Groups	Minor; if repeated then major and suspension.
30.	No formal exit and/or approval of farmers from contract with ICS	Grower Groups	Minor; if repeated then major and suspension.
31.	Irregularities in procurement and non-issuance of receipt for purchase	Grower Groups	Major; No issuance of TC.
32.	Consistency in ICS documentation not maintained as per standard requirement	Grower Groups	Minor; if repeated then major and suspension.
33.	Deliberate use of non-authorized products/ substances including GMO or its derivate.	Processing	Major Downgrade the affected product if already sold; Block related products in stock Withdrawal of transaction certificate

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34.	Following the practices that are prohibited/not allowed – same ingredient derived from organic and non-organic origin, irradiation, filtration by asbestos, use of solvents which are not of food Grade	Processing	Major Downgrade the affected product if already sold; Block related products in stock Withdrawal of transaction certificate
35.	No cleaning followed before organic production	Processing	Major; Block relevant batch of products.
36.	Lack of proper identification/display of products; inadequate labelling	Processing	Major; if repeated then suspension.
37.	No adequate preventive measures to avoid contamination (e.g.: buffer zone, drift) and/or commingling (e.g.: parallel production)	All level	Major; Block related products
38.	Use of prohibited substances for disinfection / cleaning of equipment/storage/facility	All level	Major; if repeated then suspension.
39.	No separation in time or place during processing, handling and storage of organic products and non-organic products	All level	Major; Block relevant batch and if repeated suspension.
40.	No / insufficient records to demonstrate compliance with standards	All level	Major; if repeated then suspension.
41.	Inadequate documentation to track organic products with respect to product procured, lot/batch number, quantity, status of product etc.	All level	Major; if repeated then suspension.
42.	Records including complaint record not updated or incomplete or incorrect data	All level	Minor; if repeated then major NC.
43.	No rectification of minor Non-Conformity within two-month deadline	Certification	Major and then suspension.
44.	No rectification of major Non-Conformity within one-month deadline	Certification	Suspension (maximum 6 months)
45.	No rectification of major non-conformity even after suspension	Certification	Withdrawal of certificate

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46.	No confirmation for annual audit	Certification	Temporary suspension
47.	No confirmation for annual audit even after expiry of the validity of the certificate	Certification	Non-renewal of certificate
48.	Forging, misrepresentation of scope certificate and transaction certificate	Certification	Withdrawal of certificate
49.	False information or documents provided for issuance of transaction certificate	Certification	Warning, if repeated, Suspension If affects, downgrade the product if already sold & withdrawal of transaction certificate; Block related products in stock
50.	Use of product label without approval / Misleading claims in product label	Certification	Product Recall/Suspension
51.	Violation of Trade Notice/DGFT Notification	Certification	Suspension
52.	Irregularity – residue avoidable because of ineffectiveness of operator's system	Certification/Residue	Suspension Downgrade the product already sold; Block the lot/batch in stock

6- Records;

S.No.	Document Name	Retained Period
1	Exit Interview Sheet - OG-FM-601-53	5 Years
2	Non-conformity Report - OG-FM-601-54	5 Years

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