एपीडा
APEDA

सत्यमेव जयते

Government of India
Ministry of Commerce and Industry
Department of Commerce

India Organic
जैविक भारत
Jaivik Bharat

NATIONAL PROGRAMME FOR ORGANIC PRODUCTION (NPOP)

PROCEDURES 2024

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Disclaimer

Words and expressions used but not defined in the National Programme for Organic Production (NPOP Procedure) 2024 shall have the meanings assigned to them under the National Programme for Organic Production (NPOP), 2024. In case of any conflict between the NPOP and the NPOP Procedure 2024, the NPOP shall prevail.

CHAPTER 1
ACCREDITATION PROCEDURE

1. Application for Accreditation

(i) An applicant body seeking accreditation under the NPOP shall make an online application on APEDA's portal.

(ii) The applicant body shall submit the duly completed application form, along with the prescribed fee as notified from time to time. The National Accreditation Body (NAB) shall have the right to revise the fee from time to time.

(iii) Before applying for accreditation, the applicant body shall ensure that it meets the accreditation and eligibility criteria as prescribed under Regulation 4.2 and 4.3.2 of the NPOP, respectively.

(iv) The application for accreditation shall be accompanied by the following documents:

(a) Copy of incorporation document of the applicant body (e.g., certificate of incorporation, gazette notification etc.),

(b) Copy of organizational structure,

(c) Details of financial status (audited balance sheet, Income Tax Return etc.) for the last three (3) years,

(d) Geo-coordinates and photographs of its office,

(e) Complete copy of its Certification Programme, including manner of its implementation (MoA etc.),

(f) Proof of documentation demonstrating adequate financial ability to cover liabilities (for instance, insurance policies, etc.) [as per Regulation 4.2.4 of NPOP],

(g) Complete copy of the operating and quality manual in accordance with Regulation 4.2.5 of NPOP;

(h) Duly apostilled accreditation certificate, if any, obtained from another country or duly notarized accreditation certificate, if any, obtained under any other certification program,

(i) Authority document evidencing authority to sign as authorized signatory and any

other relevant information.

(j) 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

2.1. Prima Facie Review:

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

a. whether all the supporting documents have been provided by the applicant body in support of its application.

b. whether the eligibility criteria have been met and

c. whether the policies and procedures of the certification programme are compliant with the standards laid down in the NPOP.

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

(iii) If the eligibility criteria have not been met by an applicant body, such application shall not be considered for further process and the same shall be communicated to the applicant body within 30 days of receipt of the application.

2.2. Technical review:

(i) Technical Review refers to a detailed evaluation of the Quality Manual and the Operating Manual of the applicant submitted with their application for accreditation under NPOP to ascertain their compliance with the NPOP Regulations.

(ii) After successful completion of the prima facie review, a technical review will be carried out and its report shall be communicated to the applicant body within 30 days of the completion of prima facie review.

(iii) The applicant will be given an opportunity to submit compliance and additional

documents if required in the form of a first compliance report within a maximum period of 30 days from receipt of the technical review report.

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

(v) In case some additional deficiencies are observed, the applicant body shall be informed in writing and given a time of 30 days for rectification of the deficiency(s) and resubmission of the second compliance report.

(vi) In case, the applicant body fails to submit the second compliance report within the stipulated time frame, the application shall be deemed to be rejected.

3. Physical evaluation/ Onsite audit

(i) After successful completion of documentation review, APEDA shall set up a Committee comprising members from the panel of the Evaluation Committee (EC) approved by the NAB. The Evaluation Committee shall carry out the physical evaluation / onsite audit of the applicant body.

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

(iii) The physical evaluation / onsite audit of the applicant body shall comprise of: (a) office audit and (b) witness audit to determine its compliance with the National Standards for Organic Production (NSOP) and its Eligibility Criteria laid down in the NPOP, evaluation of the quality management system, competence and skill sets of its personnel and any other requirement within the scope of the audit.

A. Office Audit:

The office audit shall involve an audit of the applicant body's office to verify the quality management system, files and records pertaining to its certification activities.

The evaluation shall include but will not be limited to the following:

(a) Evaluation of the certification programme of the applicant body to determine if the same is implemented in accordance with the National Standards for Organic

Production (NSOP) and the Eligibility Criteria laid down in the NPOP and the NPOP Procedures 2024 are being met.

(b) Evaluation of the quality management system of the applicant body.

(c) Verification of the qualification and experience of the personnel of the applicant body.

(d) Verify whether requirements of confidentiality, impartiality and that the operations are free from any conflict of interest, are being met.

(e) Interview with the applicant body's personnel to assess their competence; and

(f) any other relevant documents as required by the Evaluation Committee.

B. Witness Audit

(a) Witness Audit refers to witnessing the audit activity being carried out by the Applicant Body's inspectors/personnel to ascertain their audit skills and competency for carrying out external inspections as required under NPOP Regulations.

(b) Along with the Office Audit, the EC shall also conduct a witness audit on a sample farm organized by the applicant body for the purpose of assessing the audit skills of the applicant body's inspector(s).

4. Conformity Report

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

(ii) Two copies of the conformity report shall be duly signed by the authorized personnel of the applicant body and members of the Evaluation Committee. A Duly signed copy of the conformity reports shall be given to the applicant body and to APEDA.

(iii) The team leader of the Evaluation Committee shall prepare a detailed evaluation report. The evaluation report shall comprise, *inter alia*, the findings of the conformity report along with supporting documents. A copy of the evaluation report shall be submitted to APEDA within 30 days of the evaluation of the applicant body.

(iv) 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 Applicant Body of the same.

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

(vi) If the applicant body fails to submit the compliance report within the stipulated period of 30 days, its application shall be rejected, and the application fee shall be forfeited.

(vii) In cases where no non-conformity or deficiency has been found upon the analysis of the Evaluation Report forwarded by the EC, APEDA will prepare an assessment report to be placed for the NAB for review and decision.

5. Corrective Action Review (as applicable)

(i) APEDA shall review the corrective action submitted by the Applicant Body on the observation of the physical evaluation / onsite audit

(ii) Upon review of the corrective actions submitted by the applicant body, APEDA shall prepare a detailed assessment report.

(iii) If the non-conformities reported during physical evaluation / onsite audit are found to be still open due to inadequate corrective action as per the assessment report, the same shall be communicated to the applicant body for taking corrective measures within 30 days of receipt of the corrective action report.

(iv) If the applicant body fails to take corrective action within a period of 30 days from the date of communication of the open non-conformities, its application shall be rejected, and the application fee shall be forfeited.

6. Review of Assessment Report and Decision by the NAB

(i) The assessment report of the applicant body shall be placed before the 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 that another evaluation be conducted 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) The assessment report of the additional/verification audit (in case the same is directed by the NAB) shall be placed before the NAB for review and decision.

(v) Upon review of the assessment report of additional/verification audit, if the NAB decides that the applicant body is not fully equipped and competent to carry out the certification process, the application shall be rejected, and the applicant shall be allowed to reapply only after completion of one year from the date of such rejection.

7. Grant of Accreditation

As per the decision of the NAB, the applicant shall be granted accreditation as a Certification Body for a period of three years and only in respect of identified scope of accreditation, for which it is found competent and qualified under the NPOP.

8. Accreditation contract

(i) Upon communication of the decision of the NAB to grant accreditation, the Certification Body shall then sign an accreditation contract and code of conduct. The Certification Body shall submit and maintain with APEDA, a bank guarantee for an amount as decided by NAB. In case of major non-conformities and willful violation by a Certification Body, an amount as directed by the NAB, in writing, will be deducted by encashing the bank guarantee, after giving a personal hearing to the defaulting Certification Body.

(ii) The Certification Body shall also submit the tariff structure within the limit as stipulated from time to time, leviable on operators, to APEDA annually by the 31st day of January, or, in case of any change, for various activities, within 30 days from such change, and shall also display it prominently on their website and at their office.

9. Certificate of Accreditation

(i) On receipt of the duly executed Accreditation Contract, code of conduct, bank guarantee and tariff structure from the Certification Body, APEDA, on behalf of the NAB, shall issue the Certificate of Accreditation to the Certification Body which shall be valid for a period of three (3) years from the date of its issuance and shall specify the categories of accreditation.

(ii) The Certification Body shall be assigned an accreditation number and such accreditation number shall be depicted on all its certificates and approved labels. The accreditation granted may be renewed in accordance with the procedure laid down under NPOP.

10. TraceNet

It will be incumbent upon all Certification Bodies and Operators to operate through APEDA's traceability and certification portal called '*TRACENET*', access to which shall be provided by APEDA.

11. Annual Surveillance and Review Evaluations of Accredited Certification Bodies

(i) All the 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 visits

In addition to an annual surveillance visit, two unannounced evaluation visits shall be organized by the NPOP Secretariat to the Certification Body's office or to any of their Operator's premises/farms during the period of its accreditation. Further, additional unannounced inspections may be conducted, in case of complaints and investigations, or as directed by the NAB.

13. Renewal of Accreditation

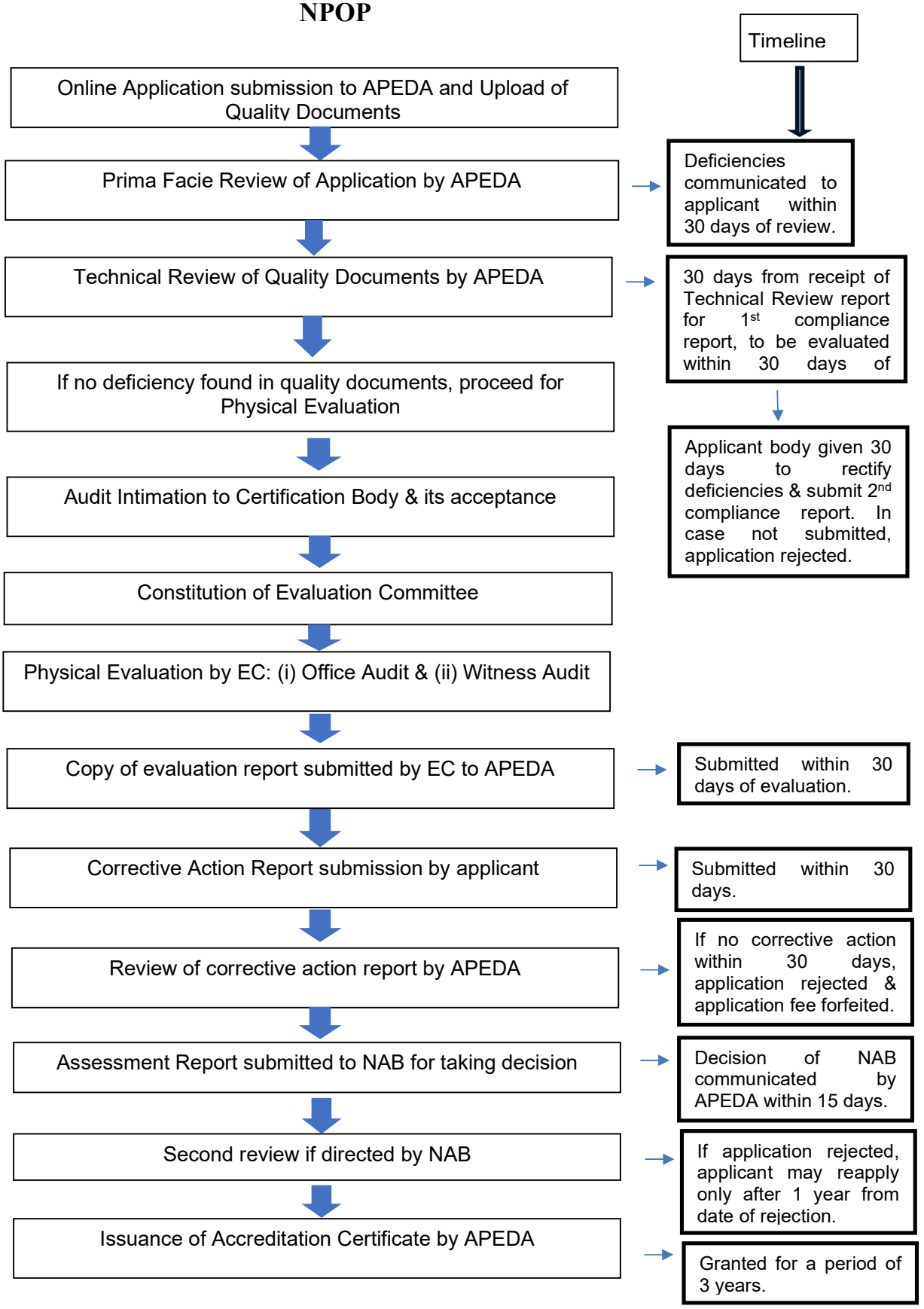
(i) The Certification Body shall, three months prior to the date of expiry of its accreditation, apply in writing for renewal of its NPOP accreditation, along with the prescribed fee, to APEDA.

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

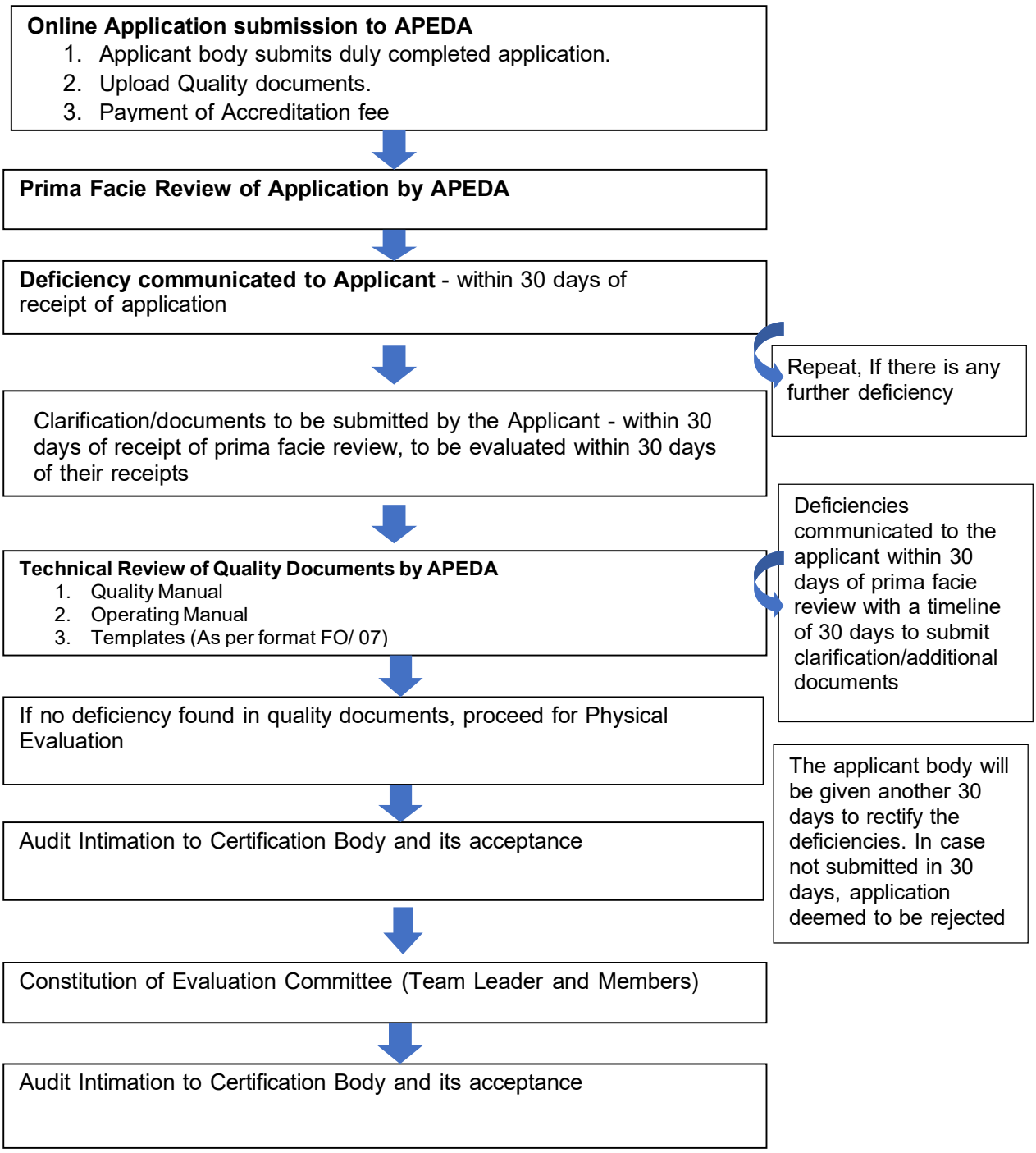
(iii) In the event of major/repeated non-conformities in the certification programme reported by the EC, NAB shall have the power to reduce the scope of certification, area of jurisdiction, or reduce the period of accreditation, or reject the renewal of accreditation, after giving a

(iv) personal hearing to such Certification Body. The reasons for the decision of the NAB shall be recorded in writing.

BRIEF PROCESS FLOW ACCREDITATION OF CERTIFICATION BODY UNDER NPOP



PROCESS FLOW OF
ACCREDITATION OF CERTIFICATION BODY UNDER NPOP



PROCESS FLOW OF ACCREDITATION OF CERTIFICATION BODY UNDER NPOP
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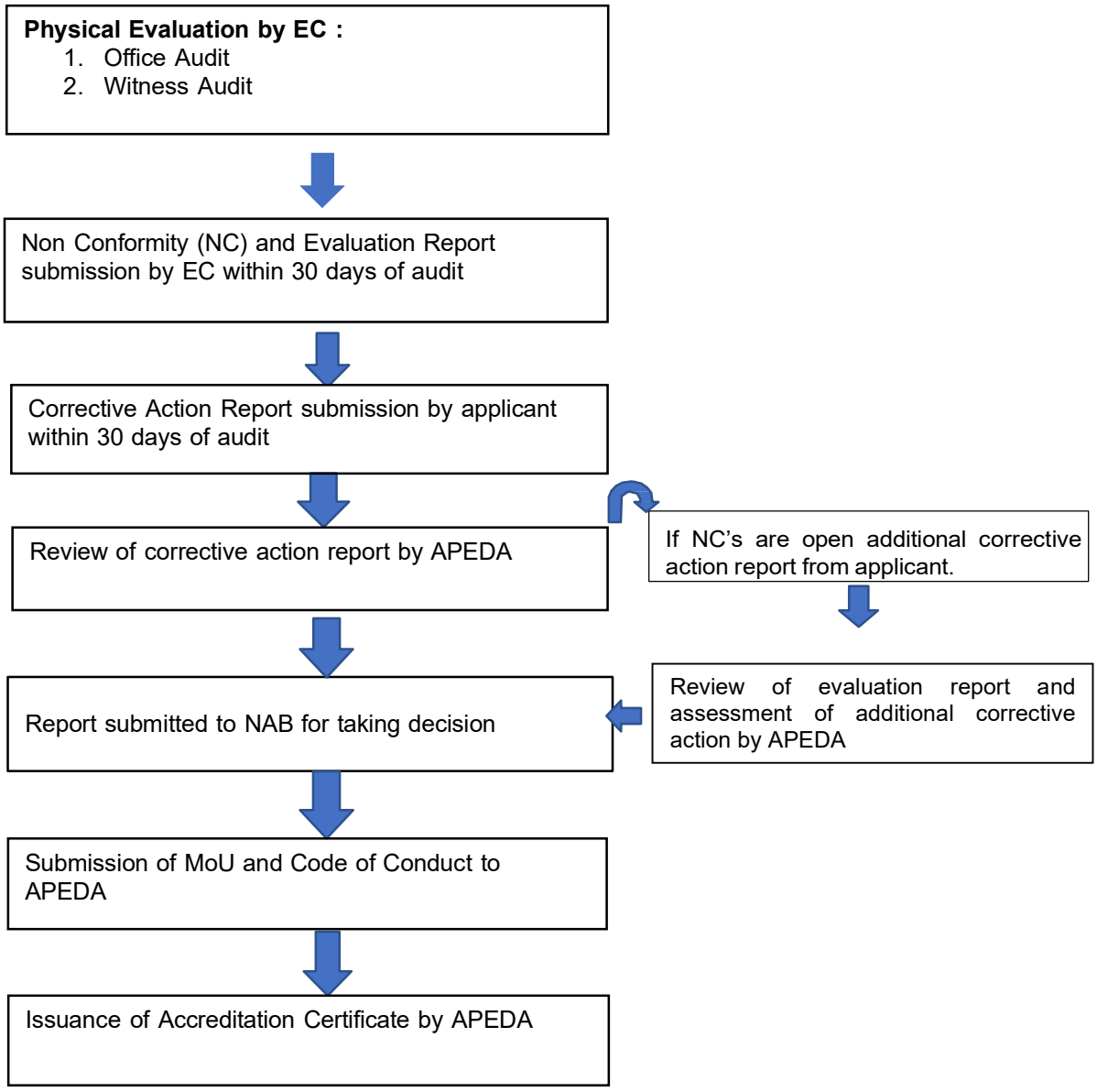
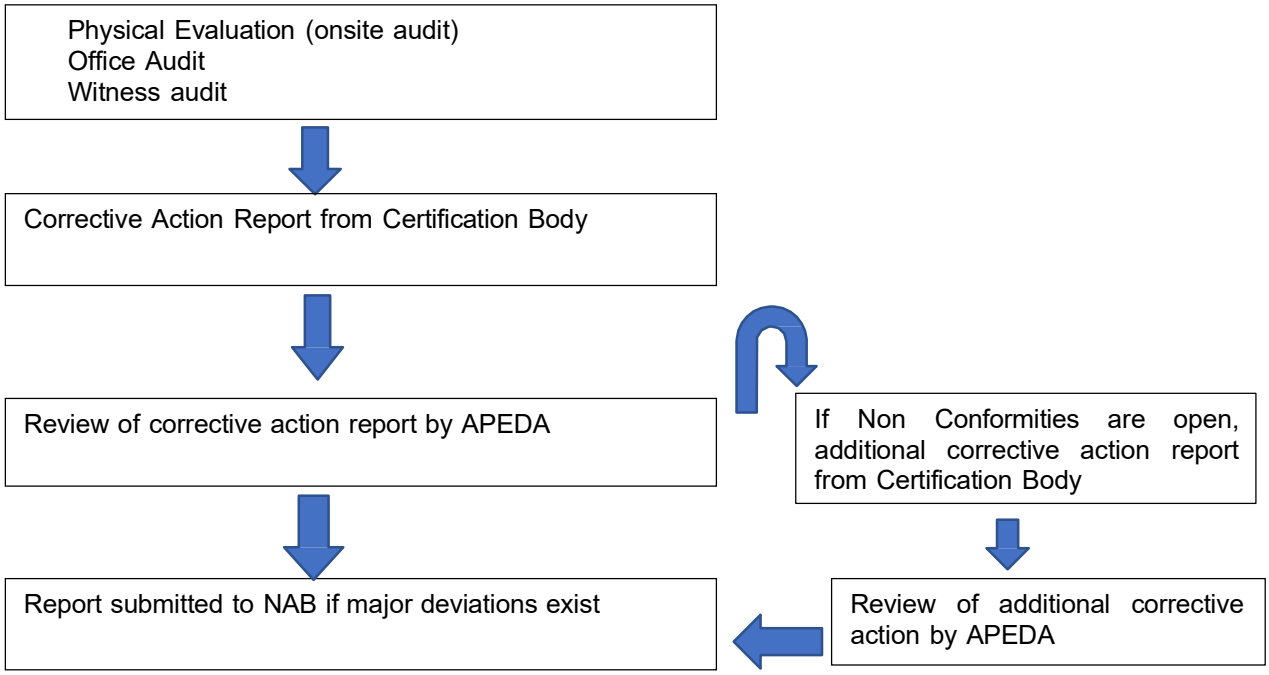
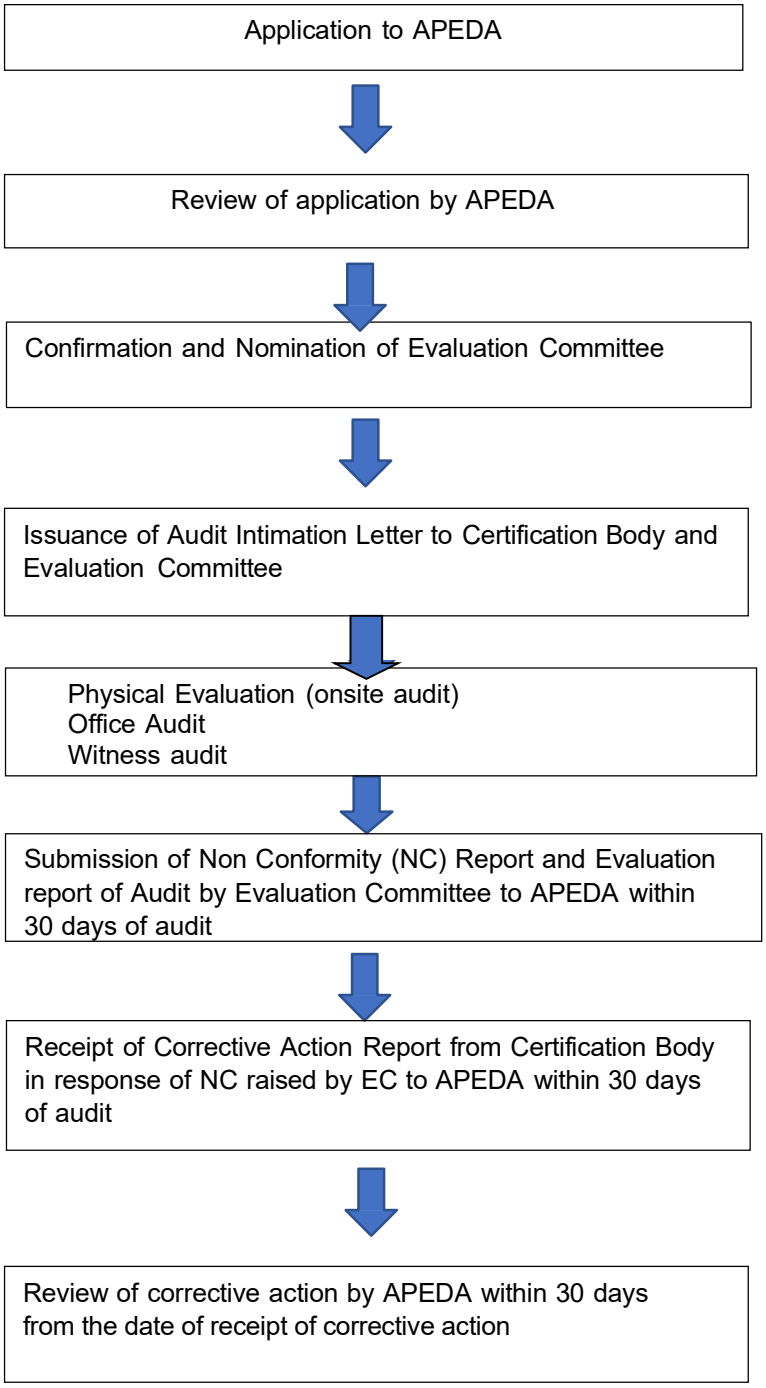
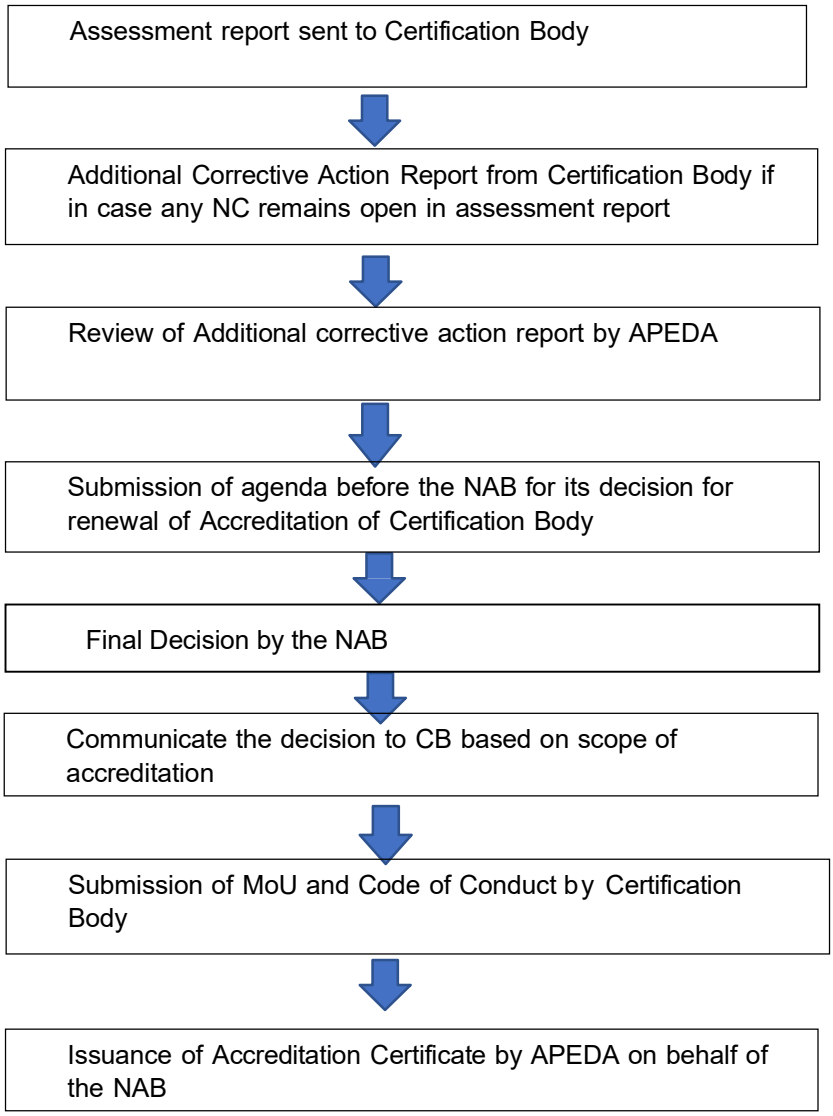


PROCESS FLOW OF SURVEILLANCE OF CERTIFICATION BODIES (ANNUAL)

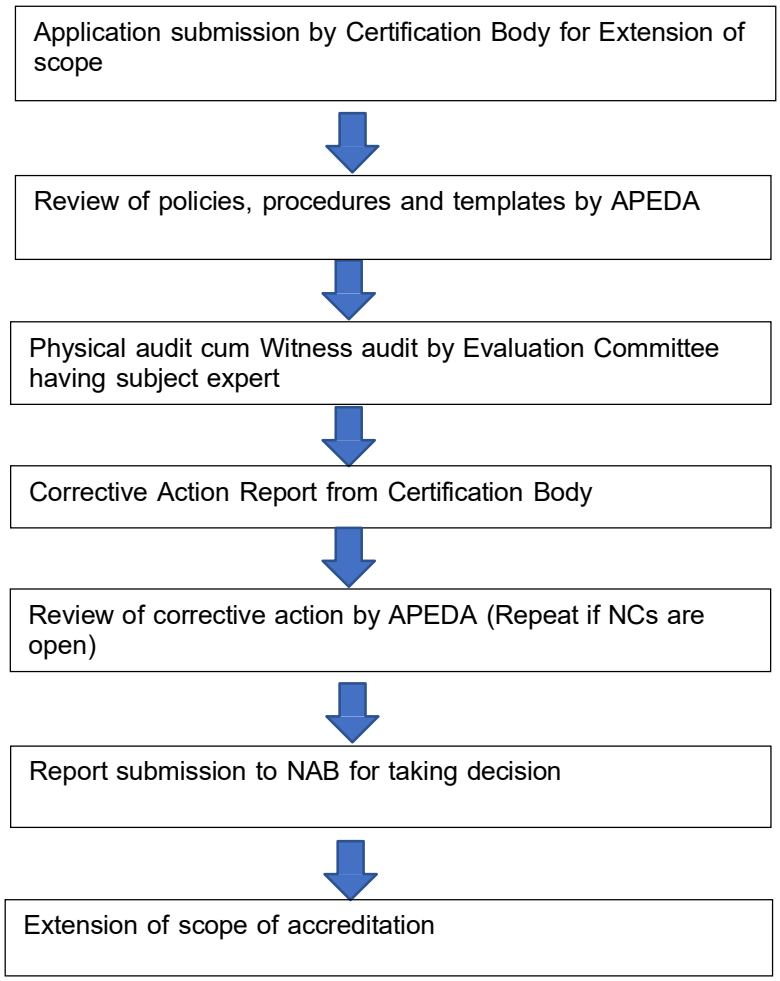


PROCESS FLOW OF RENEWAL OF ACCREDITATION (EVERY 3 YEARS)



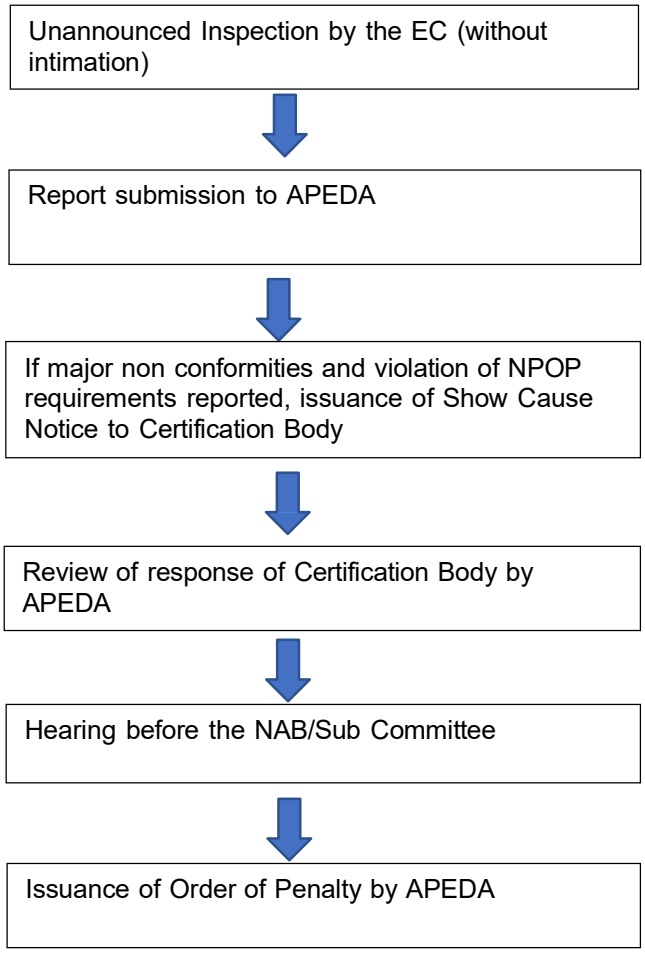

Assessment report sent to Certification Body
Additional Corrective Action Report from Certification Body if in case any NC remains open in assessment report
Review of Additional corrective action report by APEDA
Submission of agenda before the NAB for its decision for renewal of Accreditation of Certification Body
Final Decision by the NAB
Communicate the decision to CB based on scope of accreditation
Submission of MoU and Code of Conduct by Certification Body
Issuance of Accreditation Certificate by APEDA on behalf of the NAB

EXTENSION FOR SCOPE OF ACCREDITATION

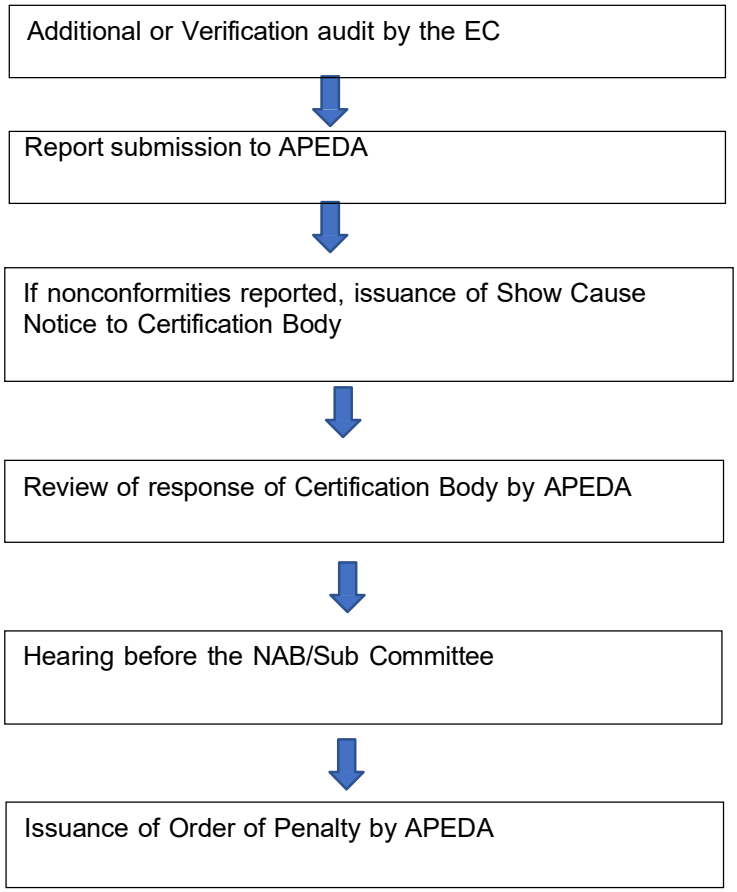


- Processing & Trading
- Livestock, Poultry and its Products
- Beekeeping/Apiculture
- Aquaculture Production
- Animal Feed Processing and handling
- Mushroom production
- Seaweed, Aquatic Plants and Green House Crop Production

UNANNOUNCED INSPECTIONS



ADDITIONAL AND VERIFICATION AUDITS



CHAPTER II
OVERSEAS ACCREDITATION

Eligibility Criteria and Requirements

1. Certification Bodies accredited under NPOP shall be eligible to seek extension of scope of accreditation for overseas certification.
2. Extension of Scope of Accreditation for overseas certification shall be granted only for the scopes for which the Certification Body (CB) is accredited under NPOP and shall be limited to their accreditation cycle. Overseas accreditation extension shall be region-specific.
3. Applicant CBs shall have expertise, equipment and infrastructure required to carry out certification activities and shall have a sufficient number of qualified and experienced staff for overseas activity for the country/countries under application.
4. The applicant CB shall have the capacity to carry out control/inspection activities to ensure compliance under NPOP.
5. Applicant CBs shall offer adequate guarantee of objectivity, impartiality, and absence of conflict of interest in the country of operation.
6. Applicant CBs shall offer adequate guarantee that the certified products exported to India meet all the standard requirements under NPOP and the Food Safety and Standards Act (FSSAI Act), 2006.

Procedure for application

1. It is a prerequisite that the applicant certification body must be accredited under NPOP.
2. The Certification Body (CB) shall make an application in the prescribed format to APEDA with the prescribed fee. As overseas accreditation shall be group-specific, separate applications will be required for separate group of countries.
3. The applicant CB shall submit their fee structure applicable to overseas operators based on scopes, which shall also be displayed on their websites.
4. On receipt of application, APEDA shall review the application and supporting documents and, at its discretion, may undertake an office audit to ascertain compliance requirements.

5. APEDA's recommendations shall be submitted to the NAB for its review and for a necessary decision on grant of overseas accreditation.

Implementation/ Audit Requirement

6. The accredited certification body granted with overseas accreditation extension shall be subjected to annual document audit during annual surveillance. In addition, APEDA may also undertake witness audit in the country of operation at least once in each accreditation cycle. The necessary cost of such overseas witness audits shall be borne by the Certification Body.
7. As the overseas accreditation extension is being granted to certification bodies accredited in India under NPOP, all operational documents shall be maintained at their India offices and shall be available for audit and surveillance.
8. The Certification body shall submit a separate annual report for overseas operations, providing details of projects registered, projects certified, TCs issued, and quantities allowed for export to India.
9. Certification shall be conducted as per NPOP requirements.

Accreditation and overseas witness audit fee for each accreditation cycle (*amended by NAB from time to time)*

1. Rs. 2.5 lakh for accreditation extension per group of countries.
2. Rs. 1.50 lakh for witness audit and surveillance (in addition to accreditation fees).

Groups of Countries for Proposed Accreditation Extension

1. European Union
2. USA, Canada and Mexico
3. Latin American and Caribbean countries
4. Africa
5. Oceania countries
6. East Asian and South Asian countries
7. Middle east and remaining Asian countries
8. Russia & CIS countries

APPLICATION FORM FOR ACCREDITATION FOR OVERSEAS COUNTRIES UNDER NPOP

1. Name of the Certification Body :

2. Name of MD/CEO/Director :

3. Address :

a. Phone No. :
b. Fax No :
c. E-mail :
d. Website :

4. Legal Status :

5. Accreditation No. & Validity of Accreditation :

6. Scopes of accreditation approved :

7. Name of the country group for which certification services have been applied for.

8. Scopes of certification being sought in the country.

9. Organizational structure and personnel
(Only the ones proposed for certification services in that country. Please enclose the organizational chart and list of personnel involved in the inspection and certification of the scope applied for, covering the qualifications, experience, job, descriptions, documentary proof of appointments, training, and other related activities)

10. Policies and procedures for inspection and certification for the scope/(s) applied for foreign country (Submit policies, procedures, and formats for operational part only, applicable for that country and the scope under NPOP).

11. Proposed tariff structure for certification of the applied scope.

12. Describe the present inspection and certification activities carried out by your for organization in that country or in any other foreign country under NPOP or under any other accreditation organic products.

13. Details of existing operations under NPOP (as applicable).

No. of Operators for:

a. Crop production
b. Livestock
c. Aquaculture
d. Food processing and handling/ trading
e. Animal feed processing and handling
f. Others (specify)

14. Number of export TCs issued, and quantity exported during the last three (3) years.

15. Please enclose the following with the application form.

a. Application fee by demand draft (as per the accreditation fee structure on the APEDA website) drawn in favour of APEDA, New Delhi/ submit online transaction details
b. Any other additional information you wish to specify.

Declaration

I hereby declare that I am the authorized signatory for M/s ……..and the information stated above is correct to the best of my knowledge.

Signature
Name
Designation
Date

CHAPTER III
INSPECTION AND CERTIFICATION PROCESS

The process mentioned in this Chapter, along with Chapter 3 and 4 of the NPOP 8th Edition, stipulates requirements to be fulfilled by the Certification Bodies under NPOP for certifying organic operations/operators for different scopes, apart from the accreditation requirements mentioned in this Chapter. Certification Bodies shall demonstrate a high degree of competence, consistency, and effectiveness in the application of these procedures, as stipulated in the operating manual of the Certification Body. For avoidance of doubt, in case of any conflict between the NPOP and the NPOP Procedure 2024, the NPOP shall prevail.

1. Inspection

The inspection shall be carried out through the Mobile Application developed and integrated with TraceNet for the purpose of inspection and certification.

The Certification Bodies shall follow standard inspection procedures as per ISO 19011 and the NPOP procedures 2024 *as amended from time to time*.

(a) 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.

(b) The same inspector shall not visit the same operator for annual inspection for more than two consecutive years.

(c) Operators do not have the right to choose nor recommend inspectors. However, Operators shall have the right to be informed about the identity of the inspector before the inspection visit, and may raise objections related to any potential conflict of interest.

(d) In case an Operator wishes to change the inspector, the Operator shall inform the Certification Body, stating the reasons for the same, before the commencement of inspection. The Certification Body shall decide on the request within three (3) working days and inform the Operator. The decision of the

Certification Body shall be final. If the request for change is not accepted, the Certification Body shall specify the reason for its decisions. Such cases shall be specifically presented to the Evaluation Committee during audits, flagged in TraceNet, and recorded separately in the software.

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

(f) The checklists used during the inspection, and the resulting inspection reports shall be comprehensive, covering all relevant aspects of the production standards and adequately validating the information provided.

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

(h) Inspector shall take precautionary measures to assess the risk of non-compliance during inspection. If a non-conformity is identified the entire lot or production affected by such non-conformity shall be removed from the production site/supply chain, and sanctions shall be imposed on the Operator. APEDA shall be informed within thirty (30) days about the action taken on the Operator by the Certification Body via TraceNet.

(i) Inspection checklists, reports and inspection shall follow specified methods to ensure a non-discriminatory and objective inspection procedure.

(j) There shall be separate inspection checklist and inspection report for each inspection. Model inspection checklists and inspection reports have been provided in NPOP Model Documents.

(k) The inspection checklist shall be filled out onsite and adequately cover all firsthand observations made during the inspection.

(l) Inspection reports shall be elaborate, providing detailed analysis by the inspector on areas where compliance might be partial; or where standards might not be clear.

(m) Inspection reports shall provide adequate information on the operations of the

certified operators, including, but not limited to:

i. Date and time of inspection
ii. Persons interviewed
iii. Crops/products requested for certification
iv. Organic system plan
v. Requirements for wild collection (if applicable)
vi. Fields and facilities visited
vii. Documents reviewed
viii. Buffer zones
ix. Risk of drift
x. Risk of contamination
xi. Inspector's observations
xii. Calculation of input/output norms, production estimates etc.
xiii. Assessment of production system of operator
xiv. Assessment of the use of logos/approvals (India organic logo, product logo as well as the Certification Body's logo)
xv. Product reconciliation and verification of stock
xvi. Interview with responsible persons (and summary of discussion)
xvii. Evaluation of compliance to standards and
xviii. Certification requirements.
xix. Input approval

1.1 Inspection methods and frequency

(i) As specified in Regulation 4.4.1.1 of NPOP, the Certification Bodies shall have laid down policy and procedure on inspection methods and frequency which shall be determined by, among others:
   (a) Intensity of production
   (b) Type of production
   (c) Size of operation
   (d) Outcome of previous inspections and the operator's record of compliance
   (e) Any complaints received under NPOP

(f) Whether the unit or operator is engaged only in certified production

(g) Contamination and drift risk

(h) Complexity of production

(ii) An opening meeting will be conducted by the inspectors wherein the inspector will explain the objectives and scope of the inspection/audit and the inspection process to be followed.

(iii) The inspector shall verify original documents during the onsite audit, conduct complete mass balance checks, systematic verification of borders of organic fields for protection against cross-contamination from neighbouring 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 are observed.

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

(v) The inspector shall sign the inspection findings, which shall be countersigned by the operator. In case the operator refuses to countersign the report, the fact of refusal shall be recorded in the inspection report.

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

a) *Announced annual Inspections.*

i. Inspection of 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. The timing of inspections shall not be so regular, so as to become predictable.

iii. 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 documented policies, procedures and criteria for additional and unannounced inspection.

b) *Additional Inspections*

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

c) *Unannounced Inspections*

i. In addition to annual inspections (100%) and 10% additional inspections, the Certification Body shall carry out minimum of 10% unannounced inspections (total of annual and additional 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.

1.2. Risk Assessment *(*Regulation 4.4.1.2 of NPOP 8th Edition**)**

i. The Certification Body shall have a documented procedure for risk assessment of noncompliance with the organic process for its registered operators covering all scope of activities. This should include risk of fraudulent activities and misrepresentation of non-organic products as organic.

ii. The risk assessment procedure shall include 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 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.

1.3 Analysis and Residue Testing *(*Regulation 4.4.1.3 of NPOP 8th Edition**)**

Apart from the advisories/directions issued by APEDA-NPOP Secretariat on this subject,

i. The Certification Bodies shall have documented policies and procedures on residue testing, genetic testing, and other analysis.

ii. These policies must*, inter alia*, include:

a. Identification of cases where samples shall be taken for analysis based on the general evaluation of risk of noncompliance with the organic process.

b. The general evaluation shall take into account all stages of production,

processing, and the chain of custody.

c. The Certification Body shall have procedures for risk-based sampling at various stages of crop production.
d. Further, the Certification Body shall have adequate post sampling procedures and measures to avoid contamination of samples during and post sampling till testing.

iii. The Certification Body shall take and analyze samples to detect the presence of unauthorized substances in the organic processes. The number of samples to be taken and analyzed by the Certification Body every year shall be at least 5 % of the total number of operators under its control. Additionally, samples from minimum 2% farmers of each Grower Group shall also be analyzed for detecting presence of unauthorized substances in the organic process.
iv. The Certification Body shall bear the cost of analysis and residue testing for the mandatory 5 % testing required under the regulation.
v. The Certification Body shall take and analyze samples in each case where the use of unauthorized products or techniques in organic production is suspected. In such cases, samples in addition to 5% shall be drawn and tested.
vi. Testing of organic products shall be conducted in ISO 17025-certified and APEDA-recognized laboratories.
vii. Testing should include the required range of unauthorized substances in the laboratory analyses as per the importing country's requirements and as notified from time to time.
viii. The Certification Body shall ensure that testing is carried out in laboratories accredited for that entire range.
ix. For export consignments, testing parameters shall be fixed as per the requirements of the importing countries. .
x. If required, additional testing shall be carried out based on risk or complaints from importing countries as intimated by APEDA.
xi. Third party sampling shall be carried out for the analysis and testing of organic products under NPOP.
xii. All samples shall be drawn by trained laboratory personnel/ Certification Body inspector.

1.3.1 Sampling and Analysis of Organic products from Grower Groups

As mentioned at clause 1.3 iii of this procedure (Regulation 4.4.1.3 (iii) of NPOP 8th Edition), the certification bodies, in addition to 5% mandatory sampling and testing of its certified operators shall carry out sampling of minimum 2% farmers of each Grower Group for analysis and residue testing for detecting presence of unauthorized substances in the organic process. The procedure for sampling is given below:

i. The Certification Body shall identify 2% of farmers within each Grower Group for testing annually.
ii. Samples shall be drawn as per procedure for sampling of organic products and as amended from time to time (Annex 1)
iii. Sampling shall be carried out during the annual inspection of the grower group.
iv. The sample shall be drawn only by the trained authorized personnel of laboratory/ certification body inspector.
v. Two individual samples shall be drawn from the lots of 2% of farmers in each Grower Groups. Out of this, one composite sample shall be prepared by the sampler for analysis. The other sample shall be retained as individual samples for counter analysis if needed.
vi. The composite samples shall be then divided in three parts, one sent to the laboratory for testing and two counter samples, one each, shall be retained by the Certification body and ICS of the grower group.
vii. Counter samples of individual farmers shall be retained by the certification body, respective farmers and the ICS of the grower group for future root cause analysis.
viii. The retention period of the counter samples shall be minimum six months.
ix. Composite Samples must be tested only in APEDA recognized laboratories for organic products.
x. Grower Group pays the laboratory for testing and obtains a receipt.

1.3.2 Testing Parameters

The testing parameters include:

- Pesticide Residues
- Heavy Metals
- Genetically Modified Organisms (GMO)
- Ethylene Oxide (ETO)
- Any other contaminants including fumigants

For Country/ region specific requirements, the certification bodies are required to follow the list of agrochemicals and other requirements circulated through advisory and as amended from time to time.

1.4. Inspection of parallel production of farms *(*Regulation 4.4.1.4) of NPOP 8th Edition)

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:

(a) Buffer zones are maintained for demarcation.

(b) Crops are visually distinguishable.

(c) Inspections are carried out at critical stage of the crop cycle.

(d) Inspection is done in a timely manner within the scope cycle.

(e) Testing shall be carried out where in risk of cross contamination is identified.

(f) Accurate production estimates are available.

(g) The crops are harvested in such a way that reliable methods exist to verify the actual harvest of the respective crops.

(h) Appropriate storage capacity exists to ensure separate handling.

(i) The documentation regarding the production is well managed and clearly distinguishes between certified and non-certified production.

Such a system shall be approved by the Certification Body for each individual operation of the operator.

1.5. Inspection of processing units

During the inspection of the processing units, the following shall be undertaken:

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 review product formulations to determine whether they meet labelling standards.

iv. The inspectors shall verify the existing record keeping system and evaluate whether it is adequate for 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 involves randomly selecting a finished product(s) either from a sales invoice, a product purchased, or a product stored 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 highlight deficiencies, if any, in the product tracking system.

ix. The inspector shall inspect all the facilities, such as storage/warehouse (including contracted storage/warehouse), etc during the annual inspection of the processing unit.

1.6. Inspections of grower groups

The Certification Bodies shall have clearly documented policies and procedures for inspection of the–grower groups as per the requirements prescribed in Chapter 5 *"Certification of Grower Groups"* of NPOP 8th Edition.

i. The external inspection by the Certification Body shall be planned only after internal inspections of all the farmers have been conducted by the Internal Control System (ICS) of the grower group twice annually (calendar year/scope cycle as applicable).
ii. The Certification Body shall have a standardized format for sourcing 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-conformity etc.

iii. The inspector shall:

a) Verify the existence of ICS office at the location of the concerned grower group.

b) Verify the 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-conformity 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 separate list of farms of 4 hectare and above 4 and inspect such farms individually. 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 in compliance with the findings of the Certification Body's sample inspection results.

iv. The inspector shall interview the farmers, ICS manager/Service Provider, if any, internal inspectors to assess the knowledge of operator on NPOP standards.

1.7. Inspection of wild product collection (Regulation 3.1.13 of NPOP 8th Edition)

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 clear enough to identify the risk of mixing up with non-certified production.

(ii) The collection area shall be at an appropriate distance from conventional farming to rule out pollution and contamination.

(iii) Verify the permission letter from the Forest Department specifying the product and the yield permitted for collection.

(iv) Verify the operator's records of all collectors and the quantities purchased from each collector.

(v) Verify that the wild collector holds the required permit for collection and transportation from the forest area.

(vi) Conduct visits to an appropriate portion of the certified area.

(vii) Verify that the collection areas have not been treated with any products other than those authorized for use in organic production.

(viii) Conduct visits and interviews with all concerned parties in the supply chain such as collectors, local agents, landowners, and other parties (environment agencies, NGOs etc.

(ix) In case cultivation is carried out by the operators in the forest area, compliance shall be verified as per the crop production standards prescribed in the NPOP.

1.8 Inspection at all stages of handling

The following applies to inspection of the whole production chain:

i. Any person who sells a product as organic under NPOP shall be registered and certified.

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

1.9. Inspection of Packed Products

Under standard circumstances, the Certification Bodies are not obliged to have a system for the inspection of products that are not handled further after being packed in the final consumer package, and/or after the issuance of a transaction certificate. The Certification Bodies are required to take action where there is reason to believe, based on information received or in its possession, that standards have been or may be violated at these later stages.

1.10. Inspection of Storage Facilities

Depending on the type of storage, the product, packaging, prevailing storage practices, and the time of storage, inspections shall be conducted. Certification Bodies shall perform a risk assessment to determine future need for inspection for all storage facilities including port facilities.

1.11 Inspection of Transport Facilities

Transport itself is not certified, but it remains the responsibility of the operator owning the product during the transport, including transport between a warehouse and a processing unit or vice-versa.

1.12. Inspection of Chain of Custody

The Certification Body shall not issue a license to use its certification mark or grant any product certificate unless it is assured of the chain of custody of the product, ensuring that all steps in the production chain are certified by other Certification Bodies under NPOP as per the National Standards of Production.

1.13. Inspection for detection of use of Genetically Engineered Products

Certification Bodies shall implement an inspection system to detect potential use of genetically engineered products. When the use of such products is detected at any stage, certification shall not be granted.

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

(a) Seeds and planting stock
(b) Production inputs
(c) Livestock feed
(d) Processing aids
(e) Ingredients

2. Certification

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

The certified operators shall sign a contract/agreement with the Certification Body obliging them *inter alia* to:

(a) Follow the standards prescribed under NPOP and other published requirements for certification.
(b) Accept inspections.
(c) Provide accurate information.
(d) Inform the Certification Body of any changes.
(e) Maintain timelines for certification including submission of data, compliance with non-conformities and other certification requirements etc.

2.1 Certification Procedure

The certification procedures shall *inter alia* include:

i. All procedural steps in processing the application until final certification.

ii. The certification status of all operators and their production shall be identified through the certification process.

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

iv. The operators are required to inform the Certification Bodies on real time basis 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 shall 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 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 (i.e submission of renewal data on TraceNet by the operator to the Certification body) for all operators shall 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.

2.2 Re-certification of same operation

i. Certification Bodies shall not re-certify the 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.

2.3 Certification Decisions

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

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

Where certification decisions are delegated to a small committee or officers, the Certification Body shall review their functions.

3. Procedure for Recertification of terminated operators

(i) In cases where certification of an Operator (including Director/Promoter) has been terminated, the Operator can apply for recertification after a period of two years from the date of termination. In such cases, the producer shall have to undergo the full conversion cycle (2 years for annuals and 3 years for perennials).

(ii) The same or another Certification Body while recertifying such operators (including Director/Promoter) must ensure due diligence and compliance by the Operator with the certification requirements.

(iii) In the case of operators (including Director/Promoter) wherein certification has been

terminated twice, such operators shall be debarred from organic certification for five years.

(iv) In case it is revealed that the Operator/Company, its directors or promoters have changed their identity to register under another identity, strict action as deemed fit by NAB shall be taken.

4. Shifting of Operators

(Please refer to regulation 4.4.8 of NPOP 8th Edition)

4.1 **Procedure for shifting of farmers under NPOP** (*(*Regulation 4.4.8.1) of NPOP 8th Edition**)**

i. The farmer(s) of a Grower Group may shift to another Grower Group under the same or another Certification Body if the farmer(s) do not want to continue with their existing Grower Group.

ii. The farmer(s) belonging to a Grower Group can take a No Objection Certificate (NOC) from the Certification Body at the start of a new season for transfer to another Grower Group in the same geographical area or to form another Grower Group with other farmers in the same geographical area.

iii. In the above instances, the farmer(s) of the Grower Group who wants to shift shall place a request to the Certification Body for issuance of NOC on TraceNet. After receiving the request for NoC from farmer(s), the Certification Body shall verify the details of the applicant farmer(s) including past record, sanctions (if any), etc. from its ICS and dispose of the NOC application within 30 days of receipt of such request.

iv. If the Certification Body does not dispose the NOC application of the applicant farmer within 30 days from the receipt of such application, such NoC application shall be automatically forwarded to APEDA, via TraceNet, and APEDA shall conduct the necessary verification and if satisfied, direct the concerned Certification Body to issue the NOC.

v. If the Certification Body rejects the NOC application of the applicant farmer, then the applicant farmer may file an appeal against such decision of the Certification Body before the NAB Sub Committee. The NAB Sub Committee shall conduct the necessary verification and if satisfied, APEDA shall direct the concerned Certification Body to issue the NOC.

vi. Any decision taken by APEDA herein shall be final and shall be complied with by the Certification Body within one week of the date of receipt of the same.

vii. Failure of the Certification Body to dispose of the NOC application within 30 days from the receipt of such application shall be considered a non-conformity under Regulation 6.1.4 of the NPOP.

viii. If the farmers are unable to operate the software themselves, the Certification Body shall facilitate the farmer to apply for NOC on TraceNet software, on charge of a reasonable fee.

5. Re-export of a product made from imported Organic Ingredients

(i) Re -export of products made from imported Organic Ingredients shall be as per the importing country's regulations. The exporters and Certification bodies are required to ensure that the products made with imported ingredients are in compliance with the organic standards of that Country.

(ii) For countries with whom there is a recognition agreement, the re-export of value-added organic products made with the other party's organic ingredients shall be as per the scope of such agreement.

(iii) Prior approval must be taken from the Certification Body before the import of the organic products for re-export. Based on risk assessment, the Certification Body may conduct testing of the imported organic products.

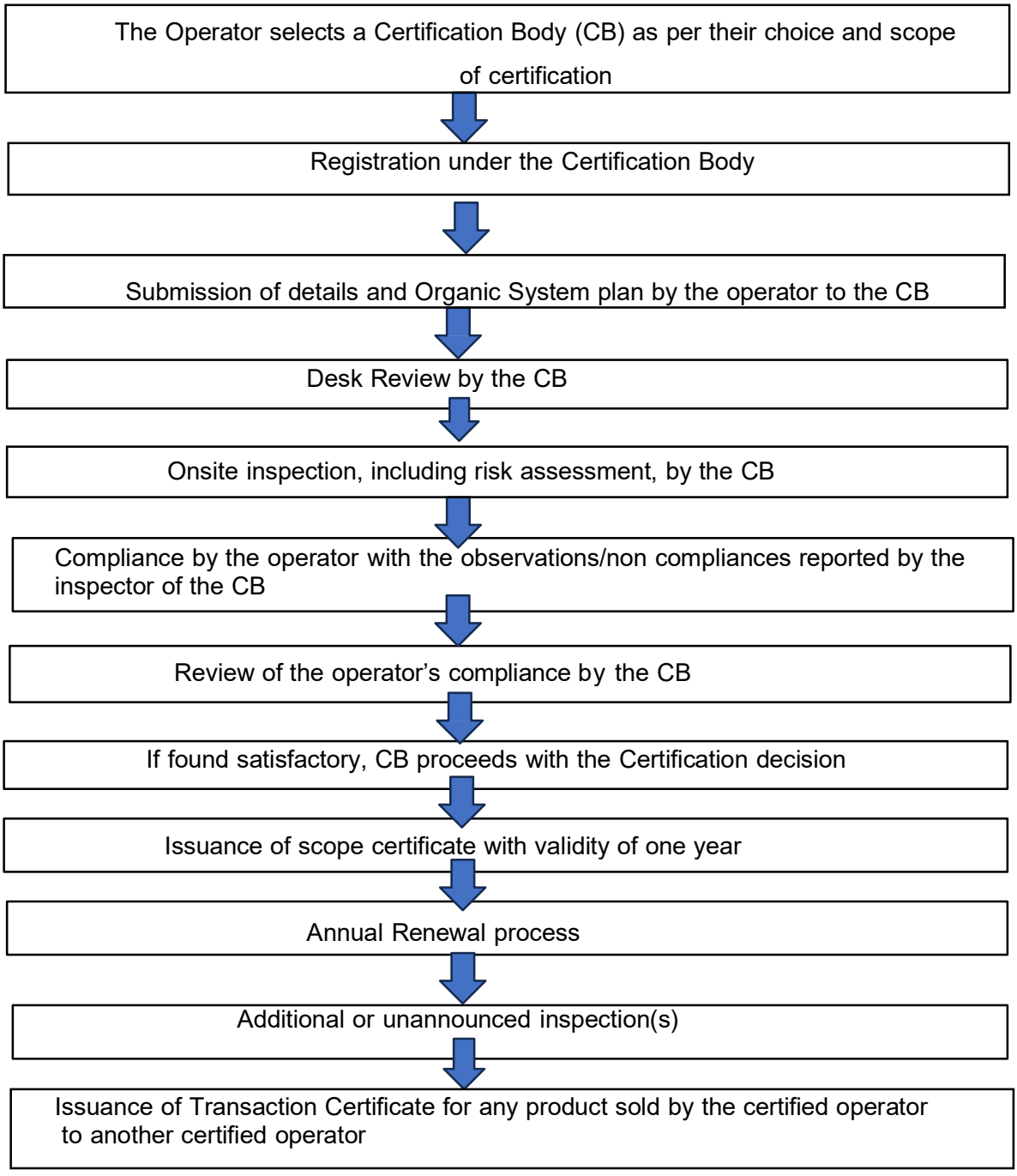
(iv) The imported organic products shall be accompanied by the organic scope and transaction certificates issued by the Certification Body accredited under NPOP

or by the Certification Body of the importing country under the Mutual Recognition Agreement (MRA), as the case may be, along with all the relevant documentations required to trace the origin and certification of the organic status of the imported ingredients.

(v) In addition to the Valid Scope Certificate indicating certification and organic status issued by the accredited certification body under NPOP or the certification body of the exporting Country wherein there is an MRA, the documentation as referred above, shall include, but not limited to, the following:

a) Transaction Certificate/Certificate of Inspection (CoI) from the exporting Country
b) Bill of entry
c) Invoice and packing list
d) Test report
e) Traceability records
f) Any other relevant document, that may be prescribed.

PROCESS FLOW OF INSPECTION AND CERTIFICATION PROCESS



Annex 1

PROCEDURE FOR SAMPLING OF ORGANIC PRODUCTS FOR DETERMINATION OF PESTICIDE RESIDUES, HEAVY METALS & Genetically Modified Organism (GMO)

1. PURPOSE

The objectives of these sampling procedures are to obtain representative sample from a lot for residue testing of pesticides, heavy metals, and detection of GMO.

2. SCOPE

These procedures covers all aspects of sampling for organic produce.

3. RESPONSIBILITY

a. Third party sampling to be carried out for analysis and testing of organic products under National Programme for Organic Production (NPOP). Samples should be drawn by trained laboratory personnel or certification body inspector. The trained samplers must attain training from a competent authority on "Regulatory procedure for sampling of organic produce for the determination of pesticide residues, heavy metals and GMO testing".

4. DEFINITIONS

4.1 Lot: A quantity of a food material delivered at one time and known, or presumed, by the sampling officer to have uniform characteristics such as origin, producer, variety, packer, type of packing, markings, consignor, etc. A *suspect lot* is one which, for any reason, is suspected to contain an excessive residue. A *non-suspect lot* is one for which there is no reason to suspect that it may contain an excessive residue.

Notes:

(a) Where a consignment consists of lots identified as originating from different growers, each lot should be considered separately for the purpose of sampling.

(b) A consignment may consist of one or more lots.

(c) Where the size or boundary of each lot in a large consignment is not readily established, each of a series of wagons, lorries, ship's bays, etc., may be considered a separate lot.

4.2 Primary sample/incremental sample: One or more units taken from one position in a lot.

Notes:

a) The position from which a primary sample is taken in the lot should preferably be chosen randomly but, where this is physically impractical, it should be from a random position in the accessible parts of the lot.

b) The number of units required for a primary sample should be determined by the minimum size and number of laboratory samples required.
c) Where more than one primary sample is taken from a lot, each should contribute an approximately similar proportion to the bulk sample.
d) Units may be allocated randomly to replicate laboratory samples at the time of collecting the primary sample(s), in cases where the units are of medium or large size and mixing the bulk sample would not make the laboratory sample(s) more representative, or where the units could be damaged by mixing.
e) Where primary samples are taken at intervals during loading or unloading of a lot, the sampling 'position' is a point in time.
f) Units should not be cut or broken to produce the primary sample(s), unless where subdivision of units is specified.

4.3 Bulk sample/Aggregate sample: The combined and well-mixed aggregate of the primary samples taken from a lot.

Note:

a) The primary samples must contribute sufficient material to enable all laboratory samples to be withdrawn from the bulk sample.
b) Where separate laboratory samples are prepared during collection of the primary sample(s), the bulk sample is the conceptual sum of the laboratory samples, at the time of taking the samples from the lot.

4.4 Laboratory sample: The sample sent to or received by the laboratory is a representative quantity of material removed from the bulk sample.

Notes*:*

a) It may be the whole or a part of the bulk sample.
b) Replicate of laboratory samples may be prepared.

5. GENERAL REQUIREMENTS OF SAMPLING:

a. Sample should be drawn only by the trained and authorized personnel of the laboratory/ or certification body inspector.

b. The exporter/manufacturer must inform the recognized laboratory regarding sample drawl through an application with details of the lot/consignment, location, etc. (Format: Application for drawl of sample)

c. Samplers should obtain sufficient quantity of the sample to ensure that the laboratories will have adequate amounts for processing and reanalysis if necessary **(Table 1)**.

d. If collecting from multiple containers as specified by the procedure to obtain the suggested amounts of the sample, samplers should confirm the products being sampled are from the same lot only.

e. The minimum number of primary/incremental samples to be taken from a lot is determined from Table 1.

Table 1. Minimum number of primary samples to be taken from a lot

Category	Minimum number of primary samples to be taken from lot
Products, packaged or in bulk, which can be assumed to be well mixed or homogenous	Minimum 3 primary samples should be taken.
Products, packaged or in bulk, which may not be well mixed or homogenous	
Weight of lot(kg)	
< 50	03
50 – 500	05
> 500	10
Number of cartons, can or container in the lot	Minimum number of cartons, can or container in the lot to be covered
1 – 25	01
26 – 100	05
>100	10

f. Each primary sample should be taken from a randomly chosen position in the lot, as far as practicable. The primary samples must consist of sufficient material to provide the laboratory sample(s) required from the lot.

g. Primary samples should be combined and mixed well, if practicable, to form the bulk sample.

h. In case, where units may be damaged (and thus residues may be affected) by the processes of mixing or sub-division of the bulk sample, or where large units cannot be mixed to produce a more uniform residue distribution, the units should be allocated randomly to replicate laboratory samples at the time of taking the primary samples. In this case, the result to be used should be the mean of valid results obtained from the laboratory samples analyzed.

5.1 Preparation of the laboratory sample

a. Where the bulk sample is larger than is required for a laboratory sample, it should be divided to provide a representative portion. A sampling technique, quartering, shall be used to prepare the minimum size required for laboratory samples as per **Table 2**.

b. Precautions shall be taken to protect the samples, the material being sampled, the sampling instrument and the containers from adventitious contamination.

To prevent contamination always wear sterile gloves while handling the sample. Swab exterior area of sample container/ bag with 70% ethanol, should be sterilized prior to opening to prevent cross contamination.

c. For GMO detection, the laboratory sample shall be of a size which ensures the quantification of the GM material at a presence corresponding to the MRPL with a statistical degree of confidence of 95%. When expressed in grain, the size of the laboratory sample shall be 3000 grains.

d. Samples should be random, and an upper limit should be placed on a sample size.

e. The minimum size of laboratory sample for GMO detection in cotton seed is 1.0 kg.

Table 2: Minimum size of laboratory sample for pesticide residues and heavy metals

Sr. No.	Commodity Type	Minimum size of laboratory Sample	Nature of primary samples to be taken
A	**COMMODITIES FROM PLANT ORIGIN**		
1.	Fresh fruit and vegetables (Single weighing more than 1.5 kg e.g. Melon and Squash etc.)	**1.5-2.5 kg** (Single large Melon or Squash exceeding 2.5 kg is acceptable).	
a.	**Small sized fresh products units** generally < 25 g (e.g. Berries, Olives, Peas etc.)	**1 kg**	Whole units or packages, or units taken with sampling device.
b.	**Medium sized fresh products** units generally 25-250 g (e.g. Apples, Oranges, Pomegranate etc.)	**1 kg**	Whole units
c.	**Large sized fresh products** Units generally > 250 g (e.g. Cabbage, Cauliflower,Cucumber etc.)	**2 kg**	
2.	Pulses, Grains, Cereals, Tree nuts (e.g., Redgram, Black gram, Lentils etc.)	**1.0 kg**	Units taken with a sampling deviceas per number of primary sample required in Table 1
	Oil seeds (e.g. Peanut, Sesame, Soybean, Sunflower, Niger seed, Mustard, Safflower etc.), seeds for beverages (e.g.Coffee beans)	**500 g**	
3.	Herbs (Fenugreek, Coriander leaves etc.) Dried herbs	**0.5 kg** **0.2 kg**	
	Spices (e.g. Cardamom, Pepper, Cumin, Coriander, Chilli powder, Ginger powder etc.)	**1.0 kg**	

4.	All liquids and semi-solid foods (e.g. Juices, oils Canned/jarred food)	**16-32 ounces (approx.500 to1000 mL)**	
B	**PRIMARY ANIMAL FEED COMMODITIES**		Whole units or units taken with a sampling device as per number of primary sample required in Table 1
1.	Legume animal feeds, and other forages and fodders etc.	**1 kg**	
2.	Straw, hay and other dried products etc.	**0.5 kg**	
C.	**PROCESSED FOODS OF PLANT ORIGIN**		
1.	**Secondary food commodities of plant origin** (e.g.Dried fruits, Vegetables, Herbs, Milled cereal products etc.) **Derived products of plant origin** (e.g. Teas, Vegetable oils, Juices, by-products for animal feed and miscellaneous products etc.) **Manufactured foods (single ingredient) of plant origin**; **Manufactured foods (multi-ingredient) of plant origin**, including products with ingredients of animal origin where the ingredient(s) of plant origin predominate(s), and group 078, breads.		
a.	**Products of high unit value**(e.g. Saffron etc.)	**0.1 kg**	Packages or other whole units, or units taken with a sampling device as per number of primary sample required in Table 1
b.	**Solid products of low bulk density**	**0.2 kg**	
c.	**Other solid products**(e.g. Bread, Flour, Apple pomace, Dried fruit)	**1.0 kg**	
d.	**Liquid products** (e.g.vegetable oils, juices)	**0.5 l or 0.5 kg**	

5.2 Packaging and transmission of the laboratory sample

a. The laboratory sample must be placed in a clean, inert container which provides secure protection from contamination, damage and leakage.

b. The container should be sealed, securely labelled and the sampling record must be attached.

c. Each sample should be identified by the following minimum information:

i. Name & Address of exporter/farmer (city/state/zip/country).
ii. Grower and handler information (both grower and handler identification should be included if the sample is not collected at the farm).
iii. Sampling location

iv. Sample identification, including commodity information, variety, brand name and lot number (if applicable), or other identification.
v. Date of sampling
vi. Sampler's name and signature

d. The sample must be delivered to the laboratory as soon as practicable (Max. within 48 hours).

Perishable commodities should be delivered to the laboratory within 24 hours. Spoilage in transit must be avoided, e.g., fresh samples should be kept cool and frozen samples must remain frozen.

It is advisable to specify the transport conditions based on the nature of the commodity to avoid confusion.

A separate table may be provided indicating commodity-wise transport temperature and time limits to reach the laboratory, as follows:

Commodity Type	Transport Temperature	Time Limit to Reach Laboratory
Fresh commodities	0–4°C	Within 24 hrs
Dry commodities	Ambient (20–25°C)	Within 48 hrs
Frozen commodities	As frozen (-20°C)	Within 24 hrs
Animal origin	As frozen (-20°C)	Within 24 hrs
Liquid commodities	0–4°C	Within 24 hrs

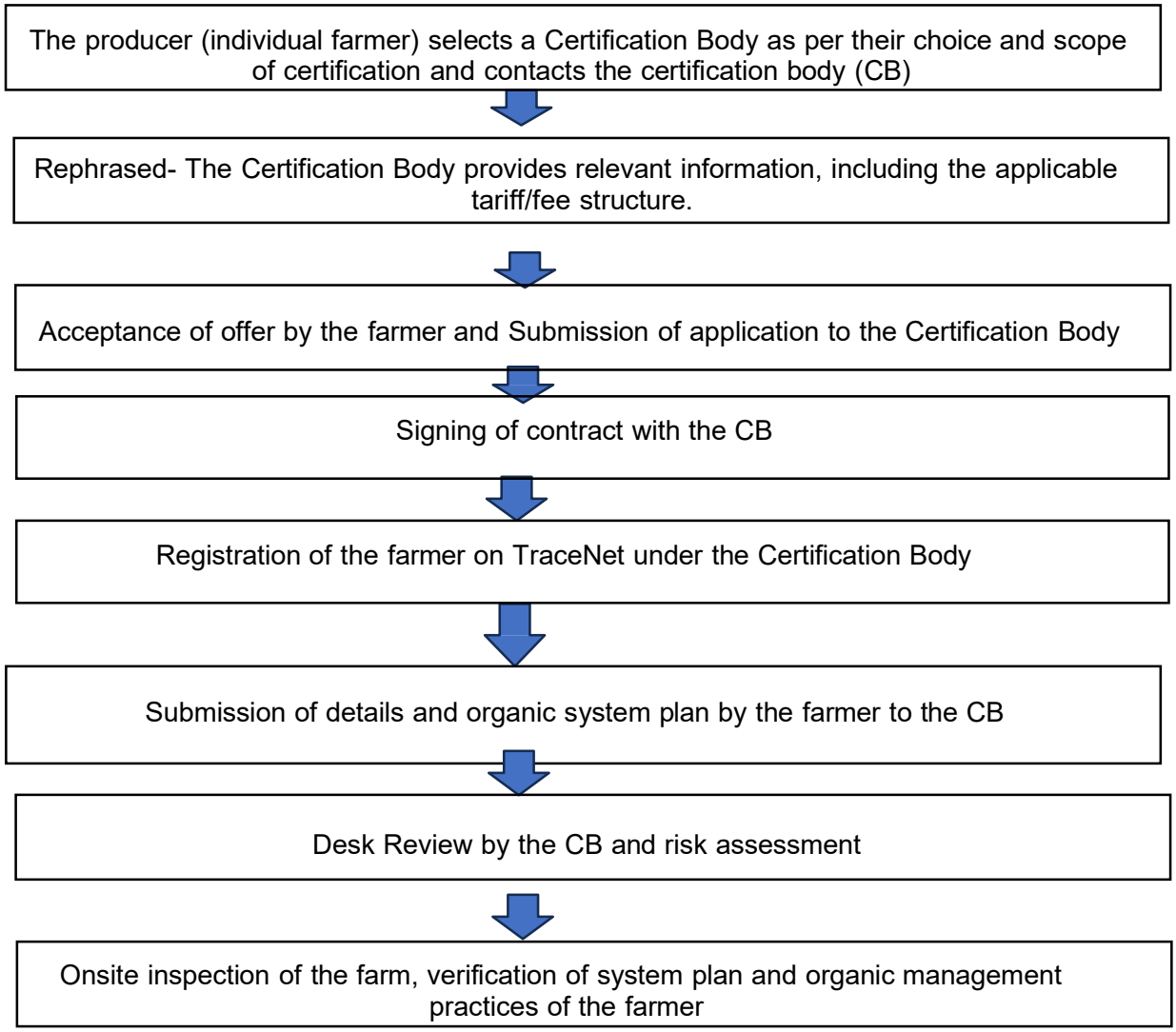
5.3 Related documents

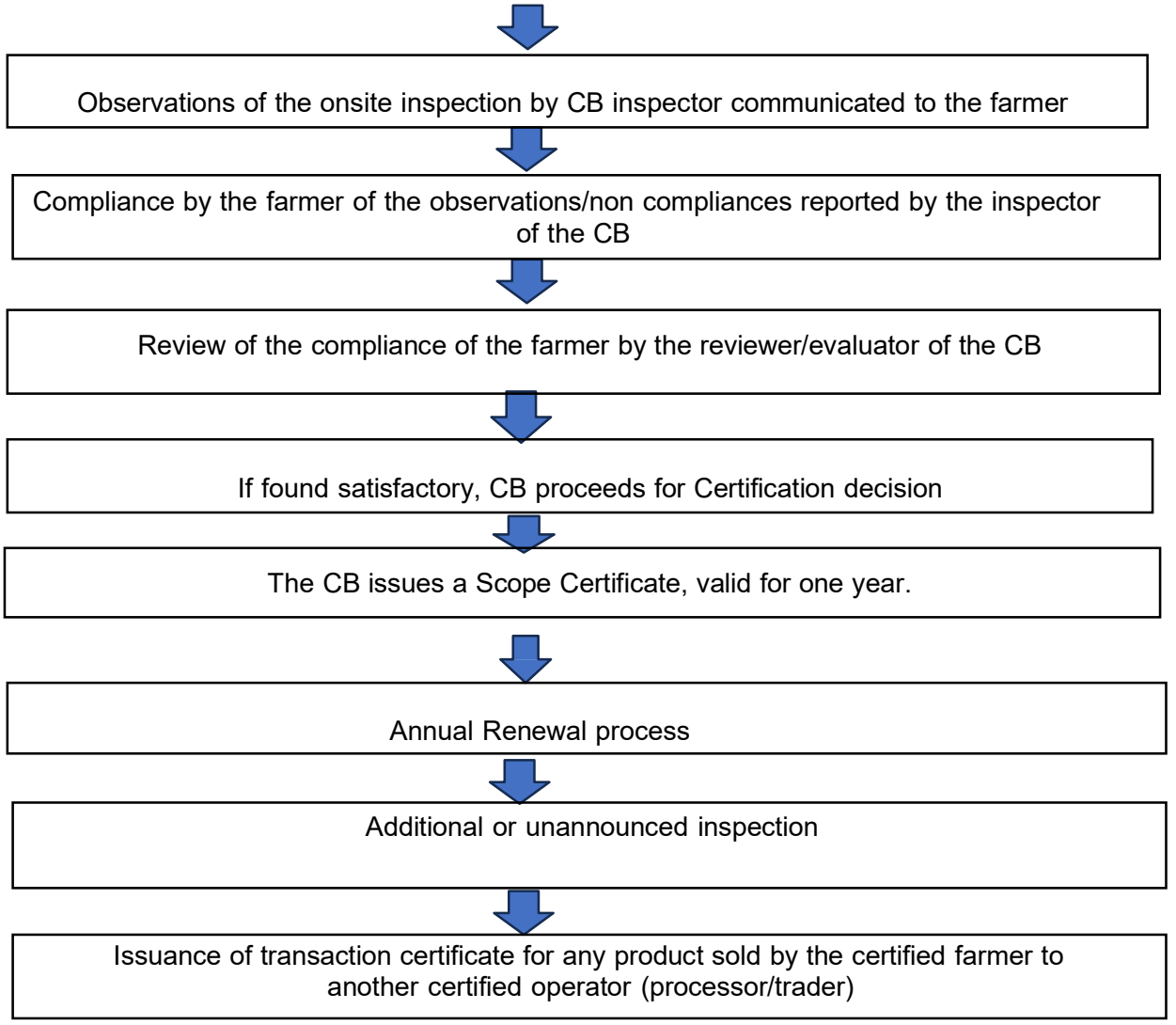
a. Application of exporter to laboratory for sampling of organic products for determination of pesticide residues/heavy metals/GMO.
b. Sample slip for organic products.

CHAPTER IV

PROCEDURES FOR INDIVIDUAL PRODUCER (FARMER) CERTIFICATION

As defined under NPOP, a producer shall mean an individual farmer or group of farmers/business enterprise practising organic farming. An individual farmer may obtain certification by a Certification Body (CB) under NPOP, for the scope of crop production, and the corresponding Scope Certificate shall be issued to the individual producer. The procedure/process flow for inspection and certification of an Individual Producer is as given below:




Observations of the onsite inspection by CB inspector communicated to the farmer
Compliance by the farmer of the observations/non compliances reported by the inspector of the CB
Review of the compliance of the farmer by the reviewer/evaluator of the CB
If found satisfactory, CB proceeds for Certification decision
The CB issues a Scope Certificate, valid for one year.
Annual Renewal process
Additional or unannounced inspection
Issuance of transaction certificate for any product sold by the certified farmer to another certified operator (processor/trader)

CHAPTER V

PROCEDURES FOR GROWER GROUPS CERTIFICATION

The requirements prescribed under Chapter 5 titled 'Certification of Grower Groups 'of NPOP 8th edition shall be complied with.

1. Grower Groups

Grower Group is defined in Clause 30 of Chapter 1 of NPOP.

2. Internal Control System

The Internal Control System (ICS) acts as the control mechanism organized by the member farmers in the Grower Group to ensure that the NPOP requirements are met by the Grower Group.

The ICS of the Grower Group along with an identified person, shall be responsible for compliance of the Grower Group with the requirements under the NPOP. Such person shall be called the ICS Manager. The ICS Manager should preferably be an existing member of the Grower Group.

3. Requirements for Grower Groups

a) The Grower Group shall be a registered legal entity in the form of:
   i. A Society registered under the Societies Registration Act, 1860 or the relevant State Societies Act/Rules,
   ii. A Farmers Producer Organization (FPO)/Farmers Producer Company (FPC) incorporated under the Companies Act, 2013, as amended from time to time,
   iii. A Co-operative society.

b) The producers in the Grower Group must follow similar production systems.

c) The land or unit, as applicable, of each member of the Grower Group shall be in geographical proximity and preferably in the same village or adjacent villages of the same district/border districts within a maximum radius of 50 Km.

d) A Grower Group shall market its products as a single entity.

e) A Grower Group shall consist of a minimum of 25 and maximum of 500 farmers. However, in case of aquaculture, the minimum group size shall be 10. The number of farmers in the Grower Group shall be reviewed from time to time by NAB, based

on performance and compliance, of the Grower Group to the NPOP requirements and may be modified by NAB as deemed fit.

f) Individual farms with land holdings of 4 ha (10 acres) and above may be a part of the Grower Group but will have to be inspected separately every year by the Certification Body. The total area of such farms shall be less than 50% of the total area of the group.
g) Each Grower Group shall have an Internal Control System (ICS) for implementing the requirements of certification of the Grower Group under NPOP.
h) The ICS shall conduct 100% internal inspections of all member farmers in the Grower Group twice a year.

4. Documents and Records of the Grower Group

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 members of the Grower Group, including name of the Farmer, Father's/Husband's name, geo-location of the farm, its area, date of joining the Grower Group, land details (organic, in conversion, non-organic), Farmer's unique ID as given by the Ministry of Agriculture and Farmers Welfare (MoA&FW), crops grown in the farm, 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 pictorial 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.

6. Documents to be provided by the ICS to the members of the Grower Group

Each member of the Grower Group shall be provided with docket in local languages, which will contain the following:

i. 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 is revision in the standards.)

ii. Prevailing farming system and package of practices available for the area

iii. 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.**

iv. Schedule of the training programmes.

7. 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 the location of each member's production unit. The map should indicate the crops cultivated in rotation and also mark any farm in an area that 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.

8. Critical control points for risk assessment

The following shall be considered as 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.

9. Internal Inspections

i. 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.

ii. For initial application, one internal inspection shall be carried out before external inspection by the certification body.

iii. The inspection will be carried out in the presence of the member or his authorized representative and must include a visit of the whole farm, storage of inputs, harvested products, post-harvest handling and animal husbandry.

iv. 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.

v. 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.**

vi. In case of serious non-conformity, the results will be reported immediately to the ICS manager and all measures will be taken according to the internal sanction procedures prescribed herein at Model ICS Manual in Model Documents.

10. Internal Approvals

(i) The ICS will have a defined procedure for approval or imposition of sanctions on the farmers in the Grower 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.

(ii) 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.

(iii) Based on the recommendation of the approval manager/committee, sanctions as per sanction catalogue (prescribed in the ICS Manual) shall be imposed on the members for the non-compliances reported in the internal inspection. The format for sanctions by ICS is at **Annex 8**.

11. Buying Procedures

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

i. The status of the farmer in the group from whom the produce is being procured should be checked.

ii. The supplied amount should be compared with the harvested amount and estimated yield. In case of any doubt, the produce shall be kept separately until clarified by the ICS manager.

iii. The delivered quantity of the product shall be registered in the purchase record.

iv. A duly signed receipt shall be issued to each farmer upon procurement of his

produce by the purchase officer stating the quantities of the product delivered with date.

v. All documents shall indicate the status of the certified product (organic or in-conversion).

vi. All bags containing organic certified products must be clearly labelled as 'organic' or as 'in-conversion'.

12. Storage And Handling Procedures

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

(i) Identification of the product at all stages of product flow during transition.

(ii) Segregation of organic products from in-conversion products.

(iii) The location in the warehouse during storage must be labelled as 'organic' or 'in-conversion'.

(iv) Fumigation of containers, irradiation/ionization, etc. are prohibited.

13. Procedure for Change of Service Provider

i. The service provider is an external body (e.g., Self-Help Groups / NGOs / Private Agency /Govt. Agency cooperative society) that may be engaged by Grower Groups, if required, for a specified period of time, on payment of mutually agreed service charges and who shall perform all duties and responsibilities of the Internal Control System(ICS) of the grower group, under the NPOP and all provisions applicable to a grower group under the NPOP, including sanctions, shall mutatis mutandis apply to such service provider.

ii. In cases wherein a grower group wants to change its service provider or the Service provider does not want to run the ICS of the group, such an engagement can be terminated by either party, by giving one month's notice to the other party, under intimation to its Certification body. In case of grower groups, written representation by at least 50% or more of its members will be treated as a valid notice.

iii. The Certification body shall ensure that dues, if any, attributable either to the

Grower group or to the Service provider shall be remitted to the concerned party, during the notice period.

iv. Two(2) weeks after the completion of the notice period(counted from the date of its receipt by the Certification Body), the Certification Body shall block the access of the existing ICS Manager/Service provider to the grower group account.

v. If either party is not satisfied by the decision of the Certification body, which for clarity is limited to the issue of settlement of dues between the parties, then the party/parties within a period of two weeks of completion of the notice period of one month, may approach APEDA for decision on the matter.

vi. APEDA shall place such case to the sub-committee constituted by the NAB for this purpose, for final decision.

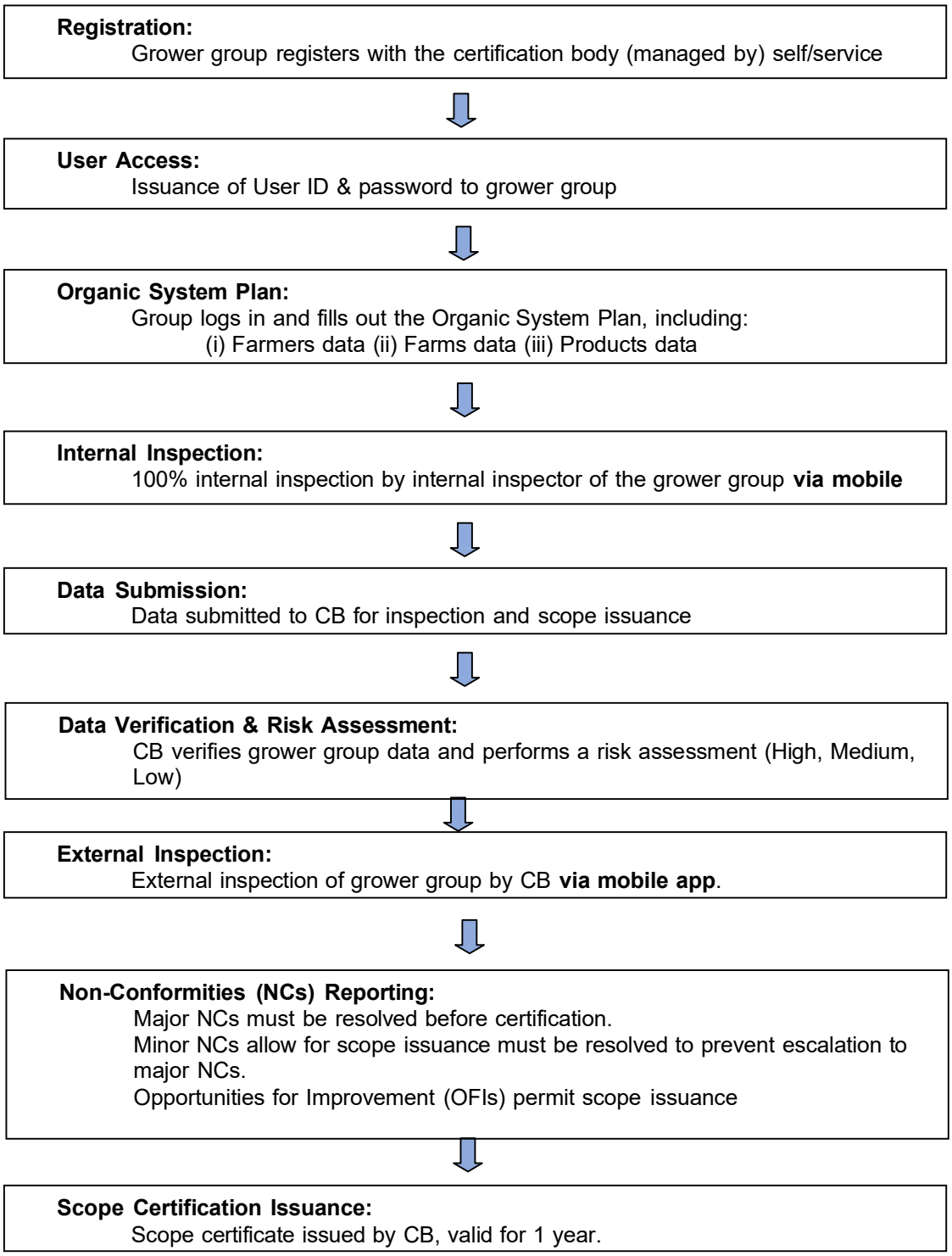
vii. The Certification Body shall then block the access of the existing ICS Manager/Service provider to the grower group account.

viii. The grower group will identify another Service provider or designate a person from within the group to act as the service provider. The representative of the group for ICS Manager should be selected by the members by more than 50% majority.

ix. The same shall be intimated to the Certification Body who shall update the contact details and provide the login credentials to the new ICS Manager.

x. In case of a new service provider, the grower group will provide the new contract. The Certification body shall update the new contract and details of the new service provider.

Process Flow of Grower Group Certification Process



Harvest and Lot Management:

Grower group enters harvest data.
CB verifies the closing stock.
Grower group/operator creates lots.

Purchase Module

Enter details of purchased product, storage of stock, and closing of stock.

Issuance of Transaction Certificates (TC):

Grower group (domestic) applies for TC issuance.
CB issues TCs.

Renewal Process:

Grower group initiates renewal process.
During renewal, operator may request changes in management type (self/service provider).
Addition of farmers/farms/products can occur during renewal/registration through a NOC (Notice of Change).

Annex 1

ICS APPLICATION FORM (for use by the farmer)

To,

The ICS Manager of Grower group

(Quality Manager/Service Provider)

Farmer name: Father's/ Mother's name:	Farmer Code:.....
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) :								
Aadhar card :								
Livestock details :								
Khasra No	Total area	Organic	Main	Inter	Main	Inter	List all the	Irrigation
		Area	Crop	Crop	Crop	Crop	inputs used	source
		In	(Rabi)	Rabi)	(Kharif)	(Kharif)	for organic	
		Hectar					Farming	
		Es						
Total								

Notes on field situation in organic crop	
Organic field with no clear borders	
All owners are organic	
Field is clearly separated from other fields by	
Storage location with capacity:	
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 ICScontract. Date: Signature of farmer: Place:
I, the ICS manager, confirm that the above mentioned information is correct. Date: Signature of the ICS Manager for acceptance Place:

Annex 2

FARMERS CONTRACT WITH ICS

Name of the ICS
and
Farmers name & Code No.

The ICS shall

1. Be responsible for coordinating the project and organic certification from anaccredited 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.
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. Entertain the complaints and appeals of the farmers and do justification within reasonable time.

The farmer shall:

1. Undertake organic farming as per the organic standards outlined in the InternalOrganic Standard as well as the Internal Control System (ICS).
2. Not use pesticides, herbicides or synthetic fertilizers on any crop within the certifiedorganic 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.
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: Place & Date	Name Stamp

Annex 3

FARM DIARY (for ICS)

Name of ICS:
Year of the Current Crop:
Season: Kharif / Rabi / Zaid/ Annual/ Others

Name of the farmer_____Code No. _Father's/ Mother's name: _____

Aadhar Number_____

Farmer address & Contact details

_____Name and address of the farm

Land details (Khasra no, GPS Coordinates etc) _____

Total land (acre)_____No. of farms /plots_____Total land offered for organic certification (acre)_____

Year in which organic production was started by the farmer_____

Date of joining of farmer in the ICS _____

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: In conversion/ organic
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	Age and plantation time in case of perennial	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:

SNo.	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 & seas on	Name of the crop/produce	Area (Ha)	Estimated product ion (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 convers ion)	Total output for sale (Kg)	Quantity sold to ICS	Purchase Receipt no. issued by ICS	Balan ce Qty	Usage Consu- mption Other issues	Remar ks

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 In charge)

…..……

…….

…….

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

……

……

……Henc e 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 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	

Farm map (Verify the availability of farm map and its accuracy)

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

Checkpoints	**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)		
Verification of farm map		
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 (own/purchased)		
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		
Harvesting (no chemicals used, no co-mingling of the final produce)		

(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**
Neighboring 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 herewith 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 *(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 herewith 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

Annexure 7

Internal organic crop production standard of Internal Control System (ICS)

This Internal organic standard is based on the National Standard for Organic Production (NPOP).

1. **Guidelines for admissions to ICS**
   (a) The farmer should be practicing organic farming.
   (b) The whole farm has to be converted to organic.
   (c) The farmer shall not be a member of any other farmer group certification.
   (d) The farmers shall maintain the farm diary for noting their activities on their farms.
2. **Farm diary shall contain:**
   (a) List of crops grown during the season, including main crops and any additional crops grown together.
   (b) Details of the methods and steps to be followed in organic crop production.
   (c) List of input used, including what they're made of, how often they're used, how much is used each time, and from where it bought.
   (d) Source of organic planting material (seeds and seedlings).
   (e) Explanation of the steps taken and physical barriers in place to keep organic production separate from non-organic farms.

3. **Guidelines for Seeds and Planting Materials**
   (a) All seeds/seedlings/planting stock used must originate from organic farms.
   (b) Only if no organic seeds and planting material are available, conventional but untreated seeds may be used after getting permission from the Internal Control System Manager for use only in first year conversion.
   (c) The farmer shall keep all the empty packets of seeds for inspections.
   (d) No seed treatment with un allowed inputs shall be done

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

5. Guidelines for plant protection measures

(a) The farmers shall undertake necessary preventive 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.
(b) 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.
(c) Only hand and mechanical weeding is allowed for weed control.

6. Guidelines for Contamination Control

(a) The borders and buffer zones shall be maintained as per the recommendation of the field officer for prevention of drift of un-allowed inputs from neighbouring farms.
(b) 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.
(c) The farmer shall not store any un-allowed inputs on the farm.
(d) Farmers will take special precautions to prevent contamination control in case of parallel production.

7. Guidelines for Soil and water conservation

(a) Measures for prevention of erosion shall be undertaken by the farmers as per the recommendation of the Internal Control System.
(b) Such practices shall include measures like cultivation according to the slopes, planting green barriers, building terraces and earth bundles, etc.
(c) The crop residues and weeds should not be burned and should be composted or used as mulch.

8. Guidelines for storage of organic produce

The farmer shall store the harvested produce hygienically and shall use the bags given to them by the ICS for the storage.

Note: the farmer should attend all the trainings organized for them by the Internal Control System.

Annexure 8

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 first year conversion

iii) Downgrading the farm produce as conventional

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

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 within a week of receiving this letter. Date:

Place:(For ICS) Signature

(Seal of ICS)

CHAPTER VI

PROCEDURE FOR EQUIVALENCY RECOGNITION AND CONFORMITY ASSESSMENTRECOGNITION WITH TRADING PARTNER COUNTRIES

1. Scope

These procedures shall apply to the process of equivalency recognition, and conformity assessment for accreditation of organic certification bodies between the National Programme for Organic Production (NPOP) of India and the organic regulations of foreign countries. This includes the certification of organic agricultural production, processing systems, and related products.

2. Procedure for Equivalency Determination Request and Conformity Assessment

A. Application for Equivalency and Conformity Assessment Recognition

A foreign government's competent authority or accreditation body, seeking equivalency determination or conformity assessment with the NPOP, shall send a formal request letter on the 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 shall 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 also 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 evaluate compliance of the foreign country's standards with NPOP regulation for the purpose of establishing an equivalency arrangement or conformity assessment.

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	

Instructions:

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 a period of 60 days 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 regarding 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 Department of Commerce (DoC) for concurrence and for obtaining political clearance of MEA.

viii. 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:

a. The scope of agricultural products covered under the determination;
b. 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;
c. The obligation to provide APEDA with information regarding corrective or enforcement actions imposed on certifying agents by competent authority,
d. The obligation to cooperate with APEDA to the extent possible, when notified in advance, with any NPOP inspections and audits' and
e. 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.

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

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

   a. Fulfilment of obligations by the governments of the two countries as specified in the equivalency agreement;
   b. Modifications of the equivalency agreement, following the revision of the equivalency recognition standards of the two countries;
   c. 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 with the scope and obligation of the recognition agreement. The frequency of the peer evaluation shall be determined during mutual agreement between the two countries.

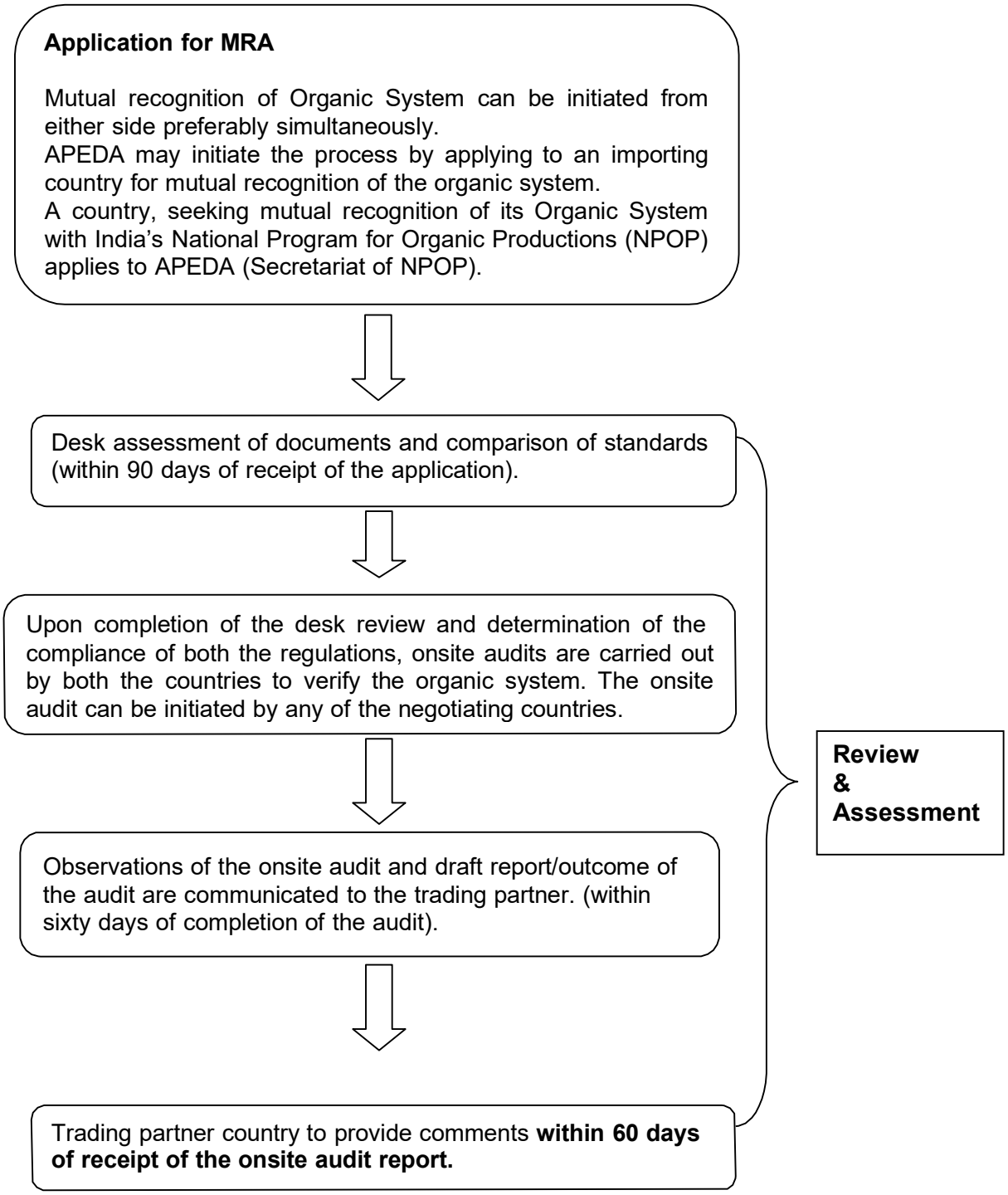
6. Exemptions/exceptions in Equivalency Recognition Standards

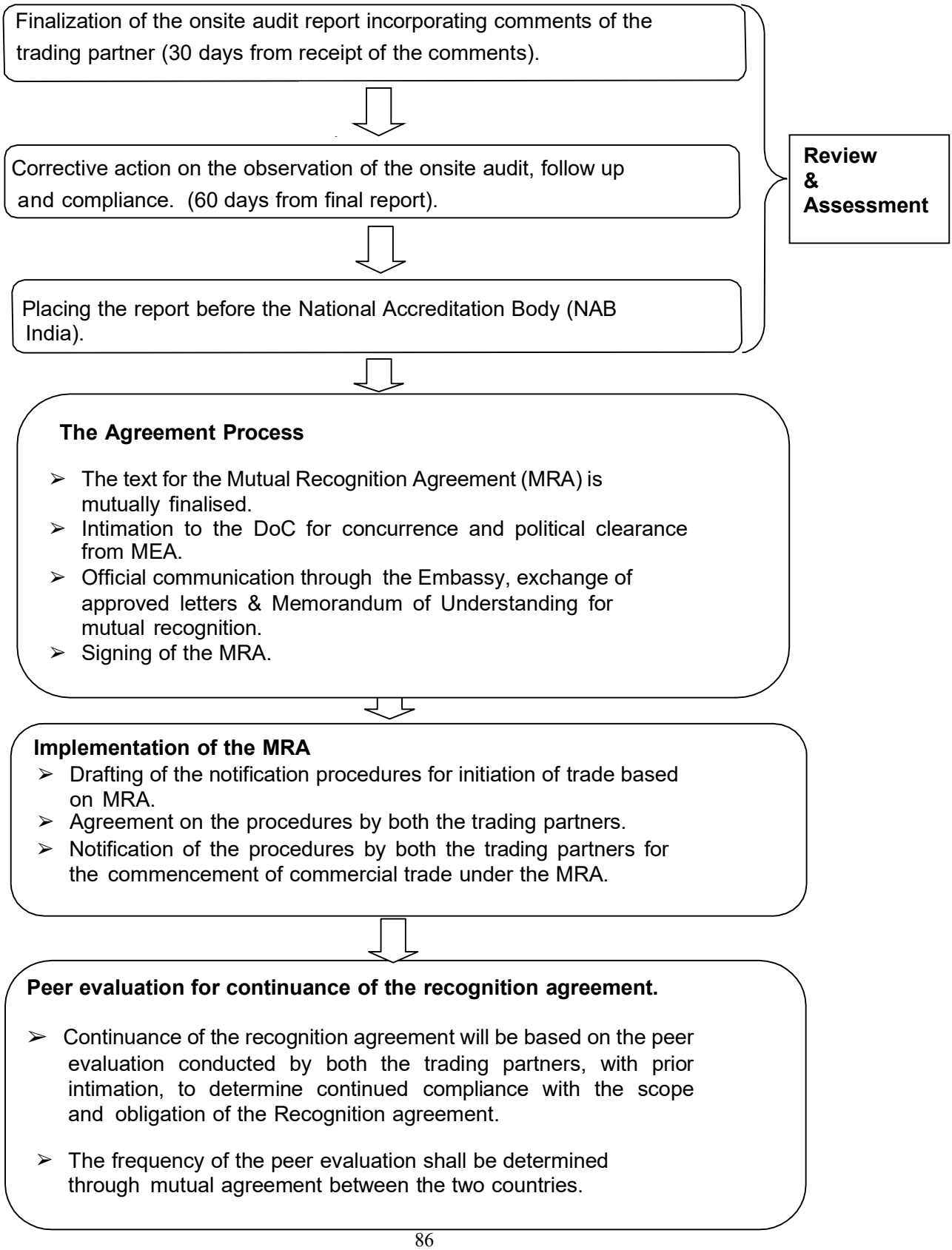
Where any differences arise in respect of equivalency recognition standards during the course of equivalency verification, the relevant standards may be assessed as equivalent,

i. Where 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
The Agreement Process
➢ The text for the Mutual Recognition Agreement (MRA) is mutually finalised.
➢ Intimation to the DoC for concurrence and political clearance from MEA.
➢ Official communication through the 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 the procedures by both the trading partners.
➢ Notification of the procedures by both the trading partners for the 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 with the scope and obligation of the Recognition agreement.
➢ The frequency of the peer evaluation shall be determined through mutual agreement between the two countries.

सत्यमेव जयते

Government of India
Ministry of Commerce & Industry
Department of Commerce