



## Certification Process

### STRUCTURE OF THE DOCUMENT « Certification Process- NPOP »

*The aim of the present document is to describe the key steps of the certification process. This document is part of your certification contract. These are the steps involved in certification, the explanation provided in this document is a brief of the procedures followed by ECOCERT India.*



## PREAMBLE

ECOCERT India Pvt. Ltd. is a subsidiary of ECOCERT Group which was founded in 2008. It is dedicated to the inspection and certification of organic operations such as plant production, growers' groups certification, processing units, exportation units and input attestation.

You have applied for certification according to NPOP standard. Thanks to this document, ECOCERT India Pvt. Ltd. will present you the different steps for the certification of your products according to NPOP requirements. Certification delivered by an independent body, allows you to attest the conformity of your products with the certification requirements. Each applicant for certification is responsible for meeting these requirements. This document does not replace the regulation(s) in force but complements it.

This documents aim to describe the main steps of the certification process. This document does not replace the regulation in force. However, it is a contractual document and it informs you about requirements concerning organic certification.

Our guarantee:

- Accredited by APEDA

- Impartiality
- Independance
- Confidentiality



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## I. ABBRIVATIONS

1. NPOP: National Program for Organic Production.
2. NAB: National Accreditation Body.
3. APEDA: Agricultural and Processed Foods Products Export Development Authority.
4. SPO: Service Purchase Order.
5. OMP: Organic Management Plan.

## II. APPLICABLE SCHEME

NPOP is managed by National Accreditation Body (NAB), APEDA. It is a public standard. ECOCERT India Pvt. Ltd. is accredited as per NPOP standards to offers services in India. In order to obtain NPOP certification the applicant needs to comply with the NPOP standard requirements and the amendments made by the accreditation body time to time in the form of notifications, advisories or any other means.

NPOP standards are available free on APEDA's ([www.apeda.gov.in](http://www.apeda.gov.in)) as well as ECOCERT India's website ([www.ecocert.in](http://www.ecocert.in) )/ on request.

## III. ACCESS TO THE CERTIFICATION

### A. Scope of our service

ECOCERT India renders its certification services as per NPOP standards for the following categories-

- a. Crop production,
- b. Organized grower groups,
- c. Processing unit
- d. Trading/ Exportation unit
- e. Wild collection/ harvest projects
- f. Input attestation

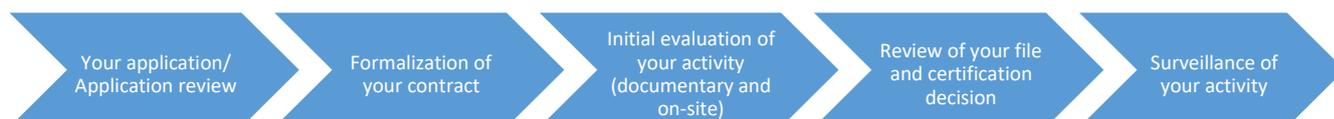
### B. Restrictions

ECOCERT India may refuse an application for certification when there are fundamental or known reasons such as illegal activities or repeated non-conformities of products/certification, inappropriate behavior, outstanding payment, potential conflict of interest which may arise, case of multiple or dual certification, suspension or denial of certification by another certification body etc.

## IV. THE CERTIFICATION PROCESS STEP BY STEP

The service is based on an annual cycle. It leads, when the certification requirements are fulfilled, to the issuance of a conformity certificates through TRACENET, allowing you to market your products with a reference to the certification and/or to NPOP and as certified by ECOCERT.

The steps of the certification process are the following (and are detailed below):



### A. Your certification application

- a. *Composition of your certification application file*



In order to give you all the needed information to complete the certification process, we send you the following documents:

- The current version of the standard if demanded (available on above mentioned websites too) - The application form(s)
- Organic management plan
- This certification process (This document)
- Tariff structure, if demanded (also available on APEDA's website)

We kindly ask you to send us the completed forms in order to

- Make sure you have read all the requirements of the standard
- Ensure that all necessary information is specified in the forms to collect all the necessary information needed for us to review your application. During the application review we do what is called "application review". The application review is the study of the feasibility and the definition of your project. It ensures that:
  - Study the feasibility of the certification of your products.
  - To analyse the scope of audit and competence required to perform inspection and certification.

*b. Application which cannot be accepted by Ecocert India*

Certification is not possible in these specific cases:

- Proven non-compliance with respect to NPOP and local statutory and mandatory requirements,
- a conflict of interest that could undermine the impartiality of our decisions,
- illegal and unethical activities by the applicant,
- operations considered to be out of scope with requested standard.
- repeated non-compliances and/ or complaints regarding the applicant or products
- suspension or withdrawal or termination by other certification body of accreditation authority,
- a geographical location that makes certification a technical impossibility or a risk for those involved,
- the lack of qualified personnel to meet the specific requirements of the client's request

## **B. Formalization of your contract**

*a. Issuance of quote for the project*

The commercial department, after the application review, will establish a customized quote for the current year and taking your specific activity into account (crop production, grower group certification, wild collection certification, processing unit certification, trading unit certification, input approval) and based on an estimate of the required working time. This quote details the total cost associated with inspection and certification activities of your operation. Audit, sampling or analysis, which are not planned in the evaluation plan are not included in the initial quotation.

The quotation is sent to you together with the Terms and conditions within 15 days, upon receipt of application. Additional time may be required for complex cases.

*b. What documents are included in your contract with ECOCERT India?*

The contract of certification is composed of the current versions of the following documents:

1. Terms and conditions,
2. This certification process,
3. Applicable standard,
4. The service purchase order (SPO)

*c. Formalizing your commitment*

Your contract is concluded upon return of the Originally signed SPO (Hard copy or Electronic).

By signing the SPO, you agree to the Terms and conditions including the compliance to the requirements defined in the NPOP standard and the amendments made by the accreditation body time to time.

You are requested to send the signed SPO along with 70% payment within 30 days from the date of dispatch of the SPO by ECOCERT India otherwise a new SPO will be generated by ECOCERT India. The remaining 30% of the payments shall be made by you upon receipt of report review notification. The payment of fees does not



substantiate the grant of certification. The decision on certification fully depends upon the level of compliance with NPOP standard and other associated requirements.

### C. Initial evaluation/ inspection

During the initial evaluation/ inspection all the activities in scope of the certification will be audited in order to check the compliance to the NPOP standard requirement.

#### a. Documents validation and preparation of your on-site audit

Your file will be allocated to a certification officer, who will be your first point of contact. The certification officer reviews the application and organic management plan. The organic management plan captures the details of your organization and operations therein. The organic management plan shall be completed and include the following data.

- Administrative details of the project, contact person, legal entity and other information deemed necessary as per tracenet.
- Complete description of the designated units and/or facilities and/or operations.
- All procedures and actions implemented onsite in relation with the designated unit and/or operation to ensure that the operation is handled in compliance with the requirements of NPOP standard.
- Complete list of inputs and/ or ingredients and/ or processing aids and/ or additives used for operation.
- Description of monitoring practices.
- Description of cleaning, pest control and separation measures.
- Description of the accounting system and traceability.
- Precautionary measures implemented in order to minimize the contamination risks by non-conforming products or substances at all stages of operations.
- Certification history.
- Any other information required by Ecocert for the compliance assessment.

The organic management plan shall be signed and dated by the operator. Upon receipt of duly signed and dated organic management plan, it will be reviewed by the certification officer in order to check the NPOP compliance of the practices and procedures stated. In case of any issues or non-compliance or missing information are identified, ECOCERT will notify the operator in writing.

The operator shall implement corrective actions in terms of practices and management system and shall inform the corrections or additional information in the form of updated organic management plan. At this stage, as the time required to perform the on-site audit may vary, ECOCERT may amend the quote provided earlier. Once the organic management plan is approved as complete and compliant, the certification officer assignees inspector who is appropriately qualified and trained to undertake the inspection according to applied certification scheme. Certification officer checks mainly that there is no conflict of interest and the person expected to conduct such evaluation/ inspection has no previous or present link with the operator and makes sure that such a person does have every appropriate document in his possession.

The certification officer issues inspection assignment to the assigned inspector considering the scope of inspection. Once the assigned inspector confirms his / her participation in the planned inspection, the concerned certification officer provides inspector with all necessary information related to your operations and all the documents referred to his / her work (inspection report formats, checklist, reviewed application form and organic management plan and other relevant information as applicable etc.)

The audit is assigned once your application has been processed. The inspection manager plans with you an audit appointment. About a week before your audit, the inspector sends to you an audit plan and reminds you to keep documents available by sending a notification of passage.

Audit plan and these documents are defined in accordance to ECOCERT procedure, according to your activities.

#### b. On-site audit

On-site audits are performed in order to check the compliance of the activities with the criteria in the NPOP standard and are conducted on all sites carrying out operations or products covered under the certification. ECOCERT India conducts audits on the basis defined audit plan, specific to your activity.

The audit is carried out according to the following steps:

- Opening meeting- Scope of audit, objectives, points to be checked, changes occurred since last inspection, audit plan and interview with the operator and / or personnel in-charge (with respect to the application form).



- Verification of the implementation of the practices and procedures as stated in the organic management plan submitted by the operator.
- Familiarization of site (with respect to maps/ actual visit.).
- Onsite visit and interview with employees.
- Observing activities to assess the extent of conformity to the requirements of NPOP.
- Verification of activities of the operator.
- Recording the observations.
- Verification of Field Records maintained by the operator.
- Collection of samples as asked in the assignment or on risk basis.
- Exit Interview/ closing meeting (Non compliances communicate with operator).

An exit interview report which states the information viz. course of visit, persons interviewed, documents verified, areas / activities / operations visited and non-conformities observed, is generated by the inspector on site and the same shall be countersigned by you as well as by the inspector. One copy will be issued to you by the inspector and one is submitted to the concerned certification officer along with the inspection report. In the event of analysis, any sampling is done in your presence or in presence of your representative, who signs the related documents. The nature of the analysis and the laboratory chosen to do the analysis are determined by ECOCERT India. If it is necessary, ECOCERT India may decide to leave sample on your premises. This sample should be used only in the event of counter-analysis. In this case, you, a representative of ECOCERT India or a bailiff may send the sample to a third party laboratory appointed by ECOCERT India according to the ECOCERT India's instructions. The cost of sampling and testing will be borne by you.

*c. Summary of your audit*

During the audit, nonconformities with regard to the standards requirements can be found. The inspector reports such nonconformities along with other details in the form of exit interview report during the closing meeting.

These non-conformities require actions (called "corrective actions / improvement actions") from you in order to obtain compliance.

You receive following your audit, the details of any nonconformity and information regarding the inspection tasks needed to verify that nonconformities have been corrected in the form of report review notification. You need to send the signed report review notification to ECOCERT India mentioning the corrective actions implemented / to be implemented to overcome the non-compliance.

*d. Evaluation of implemented corrective actions*

At this point, if you express interest in continuing the certification process, you must submit corrective actions for each nonconformity in the given time. These proposed actions must be relevant and comprehensive in order to continue the certification process. Otherwise we will ask you to suggest new actions.

Depending upon additional evaluation tasks needed to verify that nonconformities have been cleared, ECOCERT India may be required to proceed with: - A new on-site audit,

- Further sampling and analysis,
- Additional documentary evaluation

## **D. Nonconformities and corrective Action plan**

*a. "Minor" nonconformities*

Minor non-conformities shall mean such non-conformities that do not affect the integrity of organic certification.

*b. "Major" nonconformities*

Major non-conformities are severe violations that affect the integrity of the organic system in the implementation of the standards prescribed in NPOP.

*c. Corrective Action plan*

The corrective action plan lists the non-compliances and further action taken to overcome the non-compliance in future. The corrective action plan may include corrective as well as preventive measures against the non-compliances. The minor non-compliance can be closed before the renewal of certification but the major non-compliance has to be closed in order to obtain the certification i.e. unless the major nonconformities are closed



and the effective implementation of the action taken is verified by ECOCERT India to its satisfaction the certification cannot be granted.

The consequence on the certification is defined according to the nature and the severity of the nonconformity as well as its occurrence and the risk of fraud.

Appropriate measures may be:

- Continuation of certification under conditions
- Reduction in the scope of certification - Suspension of the certification - Withdrawal of the certification.
- Denial of certification.

#### **E. Review of the evaluation results and certification decision**

The audit report and your proposed corrective actions are forwarded to the concerned certification officer, who will ensure the relevance of the report sent. After the verification of corrective action plan sent by you, the complete set of documents viz. Audit report, reported non-conformities, corrective action plan and associated documents, additional documentary or on-site audit report, if any are reviewed by the certification officer who finally takes the decision on certification. You will then receive the certification decision with the analysis results (if applicable) which is based on the corrective action plan defined by you, the audit report and other related documents. If the certification decision is positive, the certification department sends you, your certification documents.

If the certification decision is negative, the certification department informs you by letter and identifies the reasons. In this case, you can apply for a new certification process beginning step A.

Analysis reports of the samples collected at your premises may be a part of decision or can be communicated to you separately. In event of detection of prohibited substances in the samples collected from your premises, from shelf, from market etc. at any point of time during the certification cycle, appropriate measures as described in § D (c) above will be taken by ECOCERT India.

#### **F. Certification documents**

Certification documents shall only be issued after, or concurrent with, the following:

- The decision to grant the certification has been made, - Certification requirements have been fulfilled.

These certification document conveys or permits identification of the following:

- The name and address of ECOCERT India.
- Name and address of certified operation.
- Effective date of certification.
- Categories of organic operation such as crop production, livestock, and wild crops, process products and group certification.
- Applicable standard and other normative documents.
- Products under certification.
- CB accreditation number, signature and seal of CB.

Brand names will not be listed in the certification document. The certification document will be generated from TRACENET only.

Costs that would be incurred (eg : manufacturing, printing labels...) in anticipation of a certification decision not yet issued are under your responsibility and cannot be supported by ECOCERT India.

Only the holder of the certification document can make reference to the certification on its products.

#### **Transaction Certificate:**

Transaction certificate will be issued from TRACENET only. You need to apply for the transaction certificate through TRACENET and submit the requisite documents as required by the system in order to get the transaction certificate. ECOCERT India will verify the correctness and authenticity of the documents submitted by you to generate the transaction certificate. Transaction certificate will only be generated after submission of all requisite documents and authentication by ECOCERT India otherwise the request may be denied by stating the reason(s) or additional information may be requested. For every transaction of organic products of any nature, the transaction certificate is an essential document, not doing so is considered as violation of the directives of APEDA. For complex products, multi-ingredient products, for the product with high value difference in between the organic and nonorganic nature, for risky crop and soyabean export consignment etc. ECOCERT India may ask for a third party analysis report of the product to be exported prior to issuance of transaction certificate. Before the issuance



of the export TC, a provisional TC has to be obtained by the client and the export TC has to be obtained within 30 days from the date of issuance of provisional TC.

### G. Surveillance and continuation of the certification process

#### a. Periodic surveillance

The certification process is due to be renewed every year, if you didn't notify ECOCERT India about the termination of your certification contract under conditions on current terms and conditions.

On the basis of any information you will send to us and/or we may collect during audit and other investigation, ECOCERT India will update your annual certification fee.

During the surveillance period, we implement the audit plan which consists of:

- Unannounced on-site audit
- Surveillance on-site audit
- Annual sampling/ analysis plan
- Etc...

#### b. Risk analysis

A general risk analysis is required to access the risk factors associated with the operation, activity or product under certification which may affect the organic integrity. Rapid alerts, complaints regarding the operator or the certified product, discrepancies or dysfunctioning in the operations, number of products under certification, positive analysis results of the products, changes in the unit description, intensity of production, type of production, size of operation, contamination and drift risk, parallel production, complexity of production may be the factors considered under risk analysis among the others.

#### c. Implementation of an audit plan

As per the requirements of NPOP the designated unit(s) and/ or facilities and/ or operations of the operator and his/her sub-contractor, if any shall be audited at least once annually.

Based on this requirement and in order to maintain the certification you shall undergo the audit by ECOCERT India including designated unit(s) and/ or facilities and/ or operations and/ or subcontractors and its documentation under certification.

- Every operation and/ or facility and/ or unit under certification shall undergo an audit at least once annually.
- The frequency of the audit may subject to increase based on the risk associated with the product, activity and operation under certification or upon changes that may have impact on organic integrity of the product.
- Based on the risk analysis, suspicion regarding the organic status of the product, notification from accreditation body or another certifying agent, ECOCERT may plan unannounced audit to check the level of compliance.

#### d. Surveillance evaluations

The corrective actions defined to deal with previous nonconformities will be checked.

Surveillance is also based on the verification of continual compliance with the certification requirements and/ or verification of any changes in certification requirements or the scope of your certification. For this reason, you must inform ECOCERT India without delay of any change in your system (manufacturing, process, quality, management, key staff, site and other) or the range of your products to be certified.

In the surveillance, steps **C**, **D** and **E** above are repeated.

### H. Renewal of the certification:

Inspection of certified operators should take place at least once annually including production farms (individual & grower group), wild collection, processing units (including subcontracted units) and at all stages of handling (storage units, packaging, shipments etc.) as per chapter 4.3.1 (Inspection and certification procedure) & 4.3.1.2.a)(i) of NPOP standard.

There are specific time frames given for renewal of scope certificates, which has been informed through APEDA advisory notes and the user manual of Tracenet.

Renewal of scope certificate **starts 3 months before its expiry so that inspection and certification process can be completed before its expiry date. However, as per APEDA guidelines additional 90 days as grace period is given**



thereafter to complete the "certification process" (e.g. for the sending and study of potential corrective actions) in case certification process not completed before expiry.

At least three months before the expiry of your certification, ECOCERT India will expect you to submit the application form and organic management plan for the renewal of certification.

To ensure completion of certification process (before expiry) Ecocert India will contact you (2-3 months before expiry) in order to arrange the inspection at least 15 days before the expiry of the certificate, otherwise Ecocert India may not be able to perform the audit.

**If inspection is not completed before expiry of the certificate, Ecocert India will not be able to renew the certificate, under these circumstances Ecocert should not be held liable in case the project is deleted from APEDA's Tracenet System.**

if you wish to continue with certification your project, it will have been treated as new registration on TRACENET. For renewal of certification steps A,C,D, E and F will be repeated.

If no major nonconformity is identified during renewal audit, the certification decision is continued and your new certification document will be issued.

Where nonconformity arises as a result of the annual, renewal or additional audit or by any other means, they will be reviewed by ECOCERT India and appropriate measure will be taken.

Where-

- i. The product(s) and/ or process(s) marked with the Certification Mark under a license / certification do not comply with the relevant norms, relevant standard and procedures of ECOCERT; or
- ii. The registered client failed to provide reasonable facilities to ECOCERT to enable them to discharge the duties imposed on them; or
- iii. The registered client has failed to comply with any of the terms and conditions of the certification.
- iv. False or unauthorized use or reference to the mark of conformity and ECOCERT certification.
- v. Violation of the directives or amendments made by the accreditation body in the certification requirement.
- vi. Complaint received regarding the certified product and proved during the investigation by ECOCERT.
- vii. Etc.

Based on the corrective action plan and regarding the extent and severity of identified nonconformities ECOCERT can take the following appropriate measures:

(i) Continuation of certification under conditions

Conditions to continue certification may be for instance:

- Increased surveillance through new audit or additional analysis
- A delay to allow you to implement corrective actions
- Etc...

If required conditions are not fulfilled in the given time, ECOCERT India will start the process of suspension or withdrawal of certification, inform the accreditation authority and update the certification documents accordingly.

(ii) Suspension of certification.

This involves the interruption of certification for a specific period or until compliance of the product. If the product is not certified yet, your certificate will be on hold. Suspension may involve one or more products and/or batch. To clear such non conformity you must provide the necessary elements within the time granted. In all cases, no reference to the certification with respect to NPOP can be made any longer for the products concerned by the suspension until the nonconformity is closed. Such suspension of the certification will ultimately have an effect on the license, during the period of suspension the license to use the certification trade mark "India Organic Logo" will also be suspended, which means during the interim period of suspension you shall cease to use India Organic Logo and ECOCERT Logo on your products, website or publicity material and by any means and shall not refer to certification. Upon revocation of suspension you can again apply for grant of licence to ECOCERT India as per manner of applying the license as prescribed in NPOP.

(iii) Reduction of the certification

This implies the immediate and final cancellation of the certification for part of the products and/or batch. The products are downgraded in the conventional circuit and can no longer make reference to the certification. This decision may be due to nonconformity noticed in audit or on your request if you do not wish to use the certification for one or more of your products (cancellation) or complaint received about the product under certification.



In case of such major non-compliance leading to reduction of the certification, ECOCERT will inform APEDA about its decision along with the reasons within 30 days from the date of implementation of sanction.

(iv) Withdrawal of certification

This implies the immediate cancellation of the certification for all your products. You cannot make reference to the certification and for any of your products. This decision is also accompanied by the termination of the contract with ECOCERT India. Withdrawal of certification will have an impact on the license. Upon withdrawal of certification the license to use the certification trade mark "India Organic Logo" will also be withdrawn, which means you shall cease to use India Organic Logo and ECOCERT Logo on your products, website or publicity material and by any means and shall not refer to certification.

A product without certificate or whose certificate has been suspended/withdrawn cannot list any reference to the certification. This ban also applies to any other communication materials.

The suspension or withdrawal of your conformity documents implies the immediate end of validity of certification documents. It is your responsibility to inform your clients that your products are not certified anymore, and to stop using of this document.

**I. Changes affecting certification:**

*a. Changes in the certification scheme (new or revised requirements)*

ECOCERT India undertakes to inform you the changes / amendments made in NPOP and certification requirements, modalities of implementation and to make available the most up to date version of the NPOP scheme on the ECOCERT website or by other means.

In some cases, the amended provisions will apply with immediate effect or transitional measures may be implemented by ECOCERT India as required.

It is your responsibility to implement changes in time and that of ECOCERT India to verify their implementation. If changes are not implemented, ECOCERT India can notify you nonconformity which, if not resolved, can lead to a reduction, suspension or even a withdrawal of your certification (see §H).

*b. Changes of your certification scope*

It is also your responsibility to inform ECOCERT India, without delay, of any changes that might affect your compliance to the certification requirements. Examples of such changes can include the following:

- Legal, commercial, organizational status or ownership,
- Organization, key staff and management,
- Modifications to the product or the production method, manufacturing process, acreage of land, - Contact address and production sites,
- Any other change(s) that may have impact on certification,
- Etc...

In case of such changes, the organic management plan shall be updated and a duly signed and dated copy shall be submitted to ECOCERT India clearly detailing the changes. In case of such changes, ECOCERT may require to initiate an investigation or additional audit in order to check the compliance with respect to NPOP standard. In that case you shall not represent and market the product(s) as organic resulting from such changes until further notification from ECOCERT India.

*c. Postponement of your Certification/ Surrender of license*

If you wish to suspend your activity (halt manufacture, packaging, farming or sale of the ECOCERT India certified products, we offer you the possibility to suspend our service for a specified time, with our contract remaining in force during this time. ECOCERT India must be notified in advance of this suspension no later than the period concerned by the suspension.

Your certification/conformity documents are no longer valid during this period. You are therefore not allowed to manufacture or sell products with a reference to the certification or to ECOCERT India, regardless of the communication support (labelling, website, communication documents, etc).

At the end of this on-hold period, the certification process is resumed at step 1 – application review, followed by an initial approval audit as for any initial application. In case of farming projects, you shall respect conversion period set by the relevant standards after the revocation of such suspension. However, 12month reduction could be considered for annuals as well as perennials provided document proof has been provided to ECOCERT India that the requirements prescribed under NPOP has been met for the period of minimum 3 years or more. This could include the land has been certified for minimum 3 years or more under participatory Gurentee System implemented by Ministry of Agriculture and wherein the products approved for use in organic farming has listed in Annex 1 and 2 of Appendix 1 of Chapter 3 of NPOP has been applied. Reduction can also be considered if proofs



provided to ECOCERT India that the land has been treated with the products approved for use in organic farming as listed under Annex 1 and 2 of Appendix 1 of Chapter 3 of NPOP.

## J. End of certification

### a. Effect on certification

You can ask to stop certification for all or a part of your products at any time. In case you would like to cease the certification of all your products and stop at the same time your contract, you must do so in compliance with the conditions defined under terms and conditions.

The end of certification for all or a part of your products, and the termination of your contract if any, implies the end of validity of your conformity certificates for the concerned products with immediate effect.

Consequently, after the termination date of the certification (and the termination of the contract as the case might be), you can no longer manufacture and market the concerned products making reference to the certification and/or ECOCERT India. Certification of products already distributed and still on the market is not questioned. In such cases ECOCERT India will inform the accreditation body.

If the Contract is terminated by you, the due fees will be fixed as follows:

- (i) 20% of the total fees in case of termination before performance of the annual inspection, (ii)
- 100% of the total fees in case of termination after performance of the annual inspection.

In the event of refund of charges, it will be done excluding all applicable taxes.

### b. Specific cases of stock selling off and stock audit

In the event you have stock of compliant products making reference to the certification or to ECOCERT India's certification, requiring a run-down period going beyond your certificate's expiry date, you are asked to renew your certification (Kindly refer **H** above). As per the TRACENET procedures the inspection for renewal of certification shall be done before the expiry of the certification. During this intervening period your contract with ECOCERT India will remain in force but you cannot sell or refer to the products as certified by ECOCERT India and / or complying with relevant standard.

After the renewal inspection, if the certification is granted by ECOCERT India, the stock of compliant products will be carry forwarded in the TRACENET (the stock will only be carry forwarded after the verification of the quantities during on-site inspection) and you will be able to sell the products in stock, provided that the product's shelf life is still valid.

In event the certification is not renewed by you or in case the certification is suspended or reduced for the renewal certification, the previous stock of the compliant product will not be carry forwarded and it will be automatically removed from the TRACENET, and you can no longer claim and market the concerned products making reference to the certification and/or ECOCERT India.

### c. Transfer of certification

The certification can be transferred from one certification body to another. For transfer of your project can only be possible after submitting such request with reasons of transfer to the certification body and obtaining the NOC through TRACENET from your current certification body. In case of project transfer you need to apply for NOC through TRACENET. In case you wish to transfer your certification from ECOCERT India to other certification body and followed by your application for NOC, ECOCERT India will issue the NOC before the expiry of your certification provided there is no pending non-conformity, complaint or appeal unresolved or investigation under process etc. Upon request by the other certification body ECOCERT India is liable to provide relevant information of your project to it. In case you wish to transfer certification from other certification body to ECOCERT India, you need to submit the NOC issued by another certification body. All necessary documents and relevant information will be requested other certification body by ECOCERT India before registration of the project. Certification transfers known to be suspended or withdrawn or with open major non-compliances or under pending appeal(s) will not be accepted by ECOCERT India. In case of a farmer seeking transfer from the existing grower's group, the ICS has to apply for the NOC for that particular farmer through TRACENET to the existing certification body. After getting approval for NOC from the existing certification body the farmer can apply as an individual grower to the certification body and get its unit registered in TRACENET as per routine procedure set by TRACENET.



## **V. SUB-CONTRACTING**

ECOCERT India uses subcontracted laboratories in order to perform analysis. ECOCERT India has subcontracted NABL accredited laboratory for analysis purpose.

## **VI. COMPLAINTS AND APPEALS**

You may be asked to submit to ECOCERT India complaints about our services, or to appeal a certification decision taken by ECOCERT India.

ECOCERT India is committed to deal with complaints and appeals in a timely manner and according to our internal procedures.

### **A. Complaints**

Anyone can send a complaint to ECOCERT India. Complaint can concern documentary validation, other client, certified product, ECOCERT India's services etc.

A response will always be sent to the individual who made the complaint under a reasonable time.

All complaints are recorded by the quality manager, as well as measures taken and an analysis is made on a regular basis to improve our service. Upon receipt of the complaint an investigation is initiated to analyse the root cause in order to implement corrective action plan. Records of complaint are maintained along with the root cause and action taken to resolve the complaint. Once the complaint is resolved, the results are communicated to the complainer by quality manager. The details of the complainer will be kept confidential by ECOCERT India. In case of complaint regarding the certified product received by you, ECOCERT India requires you to record, investigate the complaint for root cause, implement suitable corrective or preventive action and inform ECOCERT India. If required ECOCERT India may also plan an investigation in order to safeguard integrity of certification.

### **B. Appeals**

You may appeal any decision on certification by sending a written notice to the quality department, To be eligible, your appeal must:

- Be a written notice (letter or email),
- Be done within 15 days, following the receipt of the decision by ECOCERT India,
- Be duly justified: new items that have not yet been brought to the attention of ECOCERT India must be provided.

If the appeal is admissible, it is processed by impartiality / appeal committee. The decision on appeal is communicated to the interested parties by ECOCERT India. The decision by the appeal committee remains final and abiding to both the parties.

Appeals are not suspensive of the decision subject to the appeal. These decisions therefore apply until a new decision has been made after evaluation of your appeal.

### **C. Your obligation with respect to third parts claims**

You are responsible for managing third parts claims that are addressed to you directly. You must keep a record of all complaints made known to it relating to compliance with certification requirements and makes these records available to ECOCERT India. These records must keep track of the appropriate action taken and these actions must be documented.

## **VII. USES OF REFERENCES TO CERTIFICATION, TO ECOCERT AND USE OF MARKS (ECOCERT AND OTHERS) ASSOCIATED WITH THE SERVICE**

Conditions of references to the certification, to Ecocert and associated trademarks are defined in the following documents: Regulation governing use of the certification trade mark "India Organic Logo". Short title "Organic Products Certification Trademark Regulation, 2014" and Rules of Use of Marks and ECOCERT Logo.

Short title "Organic Products Certification Trademark Regulation, 2014" is part of NPOP document and is stated in Chapter – 6. This document explains the concept of India Organic Logo, manner to applying for license, manner



of grant of license, conditions for license, manner to sue the certification trade mark, obligations of the applicant, surrender of license, powers of certification body etc.

Rules of use of Marks and ECOCERT Logo accompanies this certification process.

Misuse of the trademark or incorrect reference to the certification or to Ecocert by a client may lead to the implementation of appropriate measures such as reduction, suspension or withdrawal of certification. ECOCERT India is also required to inform competent authorities.

Here are some of the cases that may arise among the others:

- The logo seal or reference to the certification or to Ecocert is made on products which are not compliant to certification requirements,
- The logo seal or reference to the certification or to Ecocert is made on products which have not been the subject of an application for certification or in the process of certification,
- Unlawful, incorrect, unauthorised or false claim and reference to the mark of conformity and ECOCERT's logo and certification.
- Failure to provide reasonable facilities/ access to ECOCERT India personnel to enable them to discharge their duties.
- In general, the rules of reference to certification are not fulfilled (thank you to read these rules, document available on internet or on request).

\* \*  
\*

ECOCERT India wish you a good certification process and remain at your disposal if you have any question:

**ECOCERT India Pvt.Ltd.**

**Unit NO. 801, 8<sup>th</sup> Floor, The Palm Square,**

**Sector- 66, Sohna Road, Gurgaon- 122018, Haryana, India.**

**Client's service**

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## **ANNEX I: Definitions**

APEDA: Agricultural and Processed Food Products Export Development Authority is the secretariat for the implementation of the NPOP.

TRECENET: A web based traceability system for use by the registered operators and accredited certification bodies under the NPOP.

Corrective action: Action to clear the cause of nonconformity or other un-desirable situation noticed.

Appeal: Written request by a client to the Ecocert India reconsideration of a certification decision the group has made.

Certification: Issuance of a certification document (cf definition)

Client: Person or organization that has subscribed a service from the Ecocert India through the signature of a service agreement.

Document of certification: certification document issued to the client attesting the conformity of products to the scheme.

Certification requirement: Specified requirement that is fulfilled by the client as a condition of establishing or maintaining certification.

Nonconformity: Non fulfillment of a requirement

Evaluation plan: Description of the number and the evaluation types needed on an evaluation cycle to grant product conformity to products requirements based on the types of clients.

Complaint: Expression of dissatisfaction, other than appeal by any person or organization to the Ecocert India relating to the activity if the group where a response is expected.

Corrective action plan: List of nonconformities related to certification requirements and their impact on the certification decision. It can be completed by additional evaluation needed to clear nonconformities.

Certification scheme: Set of requirements, rules and procedures defined by the scheme owner that must be implemented by the Ecocert India and the client.

Certification Standard: Technical document defining products requirements to be met, evaluation methods and procedures for communication on certification.

Surveillance: Repetition of the assessment, review, certification decision, according to the certification scheme, as the bases of maintenance of certification.



**ANNEX2 : Diagram of certification process**

