

# Certification Process of ISCO

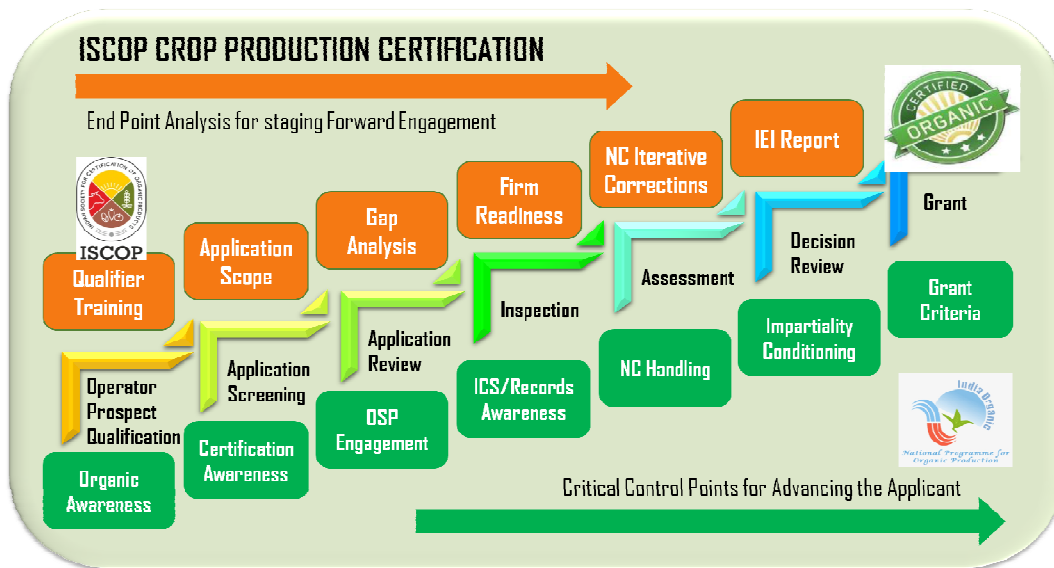
NPOP is managed by National Accreditation Body (NAB), APEDA. It is a public standard. Indian Society for Certified Organic Products (ISCO), as a registered society is a legal entity accredited as per NPOP standards to offers services in India. ISCO assess farmers, operators and processors to comply with 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 in ISCO website for you reference ([www.iscop.org](http://www.iscop.org)).

## Scope of Our Certification Services

ISCO offers certification services as per NPOP standards for the following categories- 1. Crop production, 2. Organized grower groups, 3. Processing unit, 4. Trading/Exportation unit, 5. Wild collection and 6. Input attestation.

## Certification Process of ISCO

Certification Process of ISCO is based on a set of criteria that establishes NPOP standards of the operator to a level of transparency and controlled handling.



ISCO takes the operator through a ladder of evaluation before granting certified status. Certification process of ISCO follows an engagement approach that considers end point analysis and critical control points as two major aspects to operators' status to every step in the engagement process.

ISCO considers 'organic awareness' as a primary step to engage the farmer/operator/processor to this engagement process of certification. The applicants will be evaluated for their organic awareness through "organic awareness form" and their ability to understand and prepare an Organic System Plan.

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## Step 1: Member Enrolment for Organic Awareness & OSP Guidance

ISCOP requires the members to enrol in to ISCOP membership as a first step with a minimal registration fee. This registration fee is not connected to application of certification. This is a membership fee of ISCOP that provides access to all the common services of ISCOP like

1. Evaluating eligibility to certifications (if inspection involved actuals are extra)
2. Non-conformities and guidance for non-conformities based CAPA
3. Communication related to updates in regulations and standards
4. Material List evaluation and recommendation
5. Buffer Planning recommendations
6. Farm Records/ICS guidance

ISCOP requires the prospective operators/farmers to qualify themselves before they start handling certification. As a first step, ISCOP will require them to fill an organic awareness form that will help ISCOP understand the core understanding of the operator about certification standards and organic practices. Based on this, ISCOP will take the prospects through an awareness program that will help them understand the process standards, non-conformities and sanctions. This program will also help the operators complete their OSP forms in finer detail.

If ISCOP finds the prospect less aware about the organic standards and practices, ISCOP will recommend them to get some external training before they get in to the application process.

## Step 2: Application Screening

In order to give you all the needed information to complete the application process, we will provide you the following documents: -

- The application form
- Organic System Plan Form
- Tariff structure
- Certification Process Document (this document)
- Link to latest version of NPOP standard
- Copy of Sanction catalogue

We want the applicants to send us the completed forms in order to make sure that you have read all the requirements of the standard, ensure that all necessary information is specified in the forms and empower ISCOP to collect all the necessary information needed for to review your application.

Please carefully read and fill the OSP. It will help mutually to comply with the standards. If any relevant information in OSP is out of your ability to comprehend, ISCOP shall help complete the form during review and evaluation. Please do not find the comprehensiveness of the OSP as a discouraging aspect, it will facilitate and guarantee best organic practices.

## Step 3: Application Review

ISCOP will study of the feasibility and scope of your certification requirements and competence required to perform inspection and certification. Internal review team will evaluate your completeness of the application and OSP, study the case for a prospective certification before putting the case for inspection and evaluation.

1. The applicants must note that certification is not possible in these specific cases, post evaluation or found early during application review. 1. If there is a proven non-compliance with respect to NPOP legal status, statutory and mandatory requirements for certification. Non-

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compliances will be informed clearly for the deviation in order to enable corrective action as per conformity assessment.

2. If there is a conflict of interest that could undermine the impartiality of our decisions, or manipulative documentation that conceals the conflict of interest. IS COP suggest transparency and open reveal of information against confidentiality agreement.

3. If the applicant or operator handles the operation with illegal and unethical practices either found or reported from public source when proven,

4. If the operations listed in the application request is considered to be out of scope with requested standard of operation of IS COP.

5. If repeated non-compliances and complaints regarding the products, improper use of mark licensing, misuse of certification status and other forms of misconduct,

6. Suspension or withdrawal or termination by other certification body of accreditation authority,

7. A geographical location that makes certification a technical impossibility or a risk for those involved like GMOs, industrial effluent threats, etc.

## **Step 4: Contractual Agreement**

After the application review IS COP will arrive at a customized quote for the current year and taking your operation scope into consideration (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. The quotation involves documentation charges, professional charges and evaluation charges. Audit cost, sampling or analysis, which are not planned in the evaluation plan are not included in the initial quotation. The quotation will sent to you together with the Terms and conditions within 15 days, upon receipt of application.

A contractual agreement will be signed after acceptance of the terms and payment is made. Establishing contractual agreement and payment does not mena a guarantee of certification. It only ensures guarantee for inspection, evaluation and decision review. The decision may be positive or negative.

## **Step 5: OSP Review**

During this evaluation phase all the activities of your operation presented in scope of the certification will be audited in order to check the compliance to the NPOP standard requirement.

A certification officer from IS COP will review your application and OSP. The certification officer may guide the operator for a complete OSP, which include the following data. IS COP offers a comprehensive OSP guide that can help the operator arrive at a detailed plan. In case of lack of understanding, certification officer will facilitate the understanding and enable the operator with finer aspects of OSP.

Administrative details of the project, contact person, legal entity and other information deemed necessary as per tracenet.

Complete description of the designated farms or facilities or units or operations.

All procedures and actions implemented onsite in relation to compliance with the requirements of NPOP standard.

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Exhaustive list of farm inputs, restricted material use, sanitary materials, ingredients, processing aids and additives used for operation.

Detailed description of organic practices and its scientific integrity along with regular monitoring practices that facilitate tracing contamination and control.

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.

Organic system plan signed by the operator will be treated as the base document for all deviations arise out of your annual implementation. Operators should consider this fact that third-party organic certification is a global legislation and any discrepancy will lead to legal punitive consideration as applicable. So we want you to take the OSP process as means to learn and promote organic status in a systematic way.

In case of any issues or non-compliance or missing information identified in OSP, we will notify the operator in writing. The operator shall implement corrective actions in terms of practices and modify OSP accordingly and inform the corrections. Once the OSP is approved as complete and compliant, the certification officer will assign inspector who is appropriately qualified and trained to undertake the inspection according to applied certification scheme. The Lead inspector will plan with you an audit appointment at least a week before your audit, the inspector will send an audit plan with the list of documents required during audit.

## **Step 6: Farm/Site Audit**

IS COP will conduct on-site audit 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. IS COP will conduct audits on the basis a defined audit plan, specific to your activity.

The audit is carried out according to the following steps:

- Audit Purpose and Opening discussion
- Running the Scope of audit,
- Evaluating Core objectives of the Inspection,
- Evaluating Organic Control points to be checked,
- Noting changes occurred since last inspection,
- Interview with the operator and personnel in-charge at will
- Verification of Field Records maintained by the operator.
- Collection of samples as required
- Verification of the implementation of the practices and procedures as per OSP
- Non-compliance communication
- Evidence collection as photos, lab reports, statutory aspects
- CAPA plan and Closing meeting

During the audit, nonconformities with regard to the standards requirements will be found. The inspector reports such nonconformities and these non-conformities require actions from you in order to obtain compliance. You will receive formal communication about the details of nonconformity and information regarding the inspection tasks needed to verify that nonconformities have been corrected in the form of report review notification.

## **Step 7: Non-conformities Correction**

We classify NCs in to minor and major. Minor non-conformities shall mean such non-conformities that do not affect the integrity of organic certification. Major non-conformities are severe violations that affect the integrity of the organic system in the implementation of the standards prescribed in NPOP.

The minor non-compliance can be closed before the renewal of certification but the major noncompliance 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 IS COP to its full satisfaction, the certification will 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.

Sanctions for NC include: - Continuation of certification under conditions - Reduction in the scope of certification - Suspension of the certification - Withdrawal of the certification. - Denial of certification.

Please verify our detailed sanction catalog for this purpose. Sanction catalog is attached with this process document as an annex.

## **Step 8: Certification Decision Review**

The audit report and evidence verified corrective actions will be forwarded to the concerned certification officer, who will present the case to an independent counsel for certification decision. The certification officer will present the case will all relevant documents and evidences. After the verification of corrective action plan, 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 counsel that finally takes the recommendation of grant.

The counsel will make conditional obligations on the award of certification, based on that the management of IS COP will take a decision to grant certification. You will then receive the certification decision with the analysis results. 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 1.

## **Step 9: Certification Documents**

Certification documents shall only be issued based on: - The decision to grant the certification has been made, - Certification requirements have been fulfilled.

This certification document conveys or permits identification of the following:

- The name and address of IS COP.
- 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.

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The certification document will be generated from TRACENET only. Only the holder of the certification document can make reference to the certification on its products. A third party other than the operator cannot claim the certification of this product as a reference.

## **Step 10: Transaction Certificate**

When you produce/process the product, the harvest, process details or transaction details should be reported by the operator as a condition and the organic claim will be conditional to transaction certificate. The producer or processor must apply for transaction certificate in order to validate the organic status of the product they produce. If the operation fail to report it in the TRACENET will be considered conventional and organic claim is not legal. The operator is liable for such act of claiming 'organic' without registering the harvest or processing in tracenet and makes a transaction certificate available to the buyer.

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. ISCOP 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

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 ISCOP may request for a third party analysis report of the product to be exported prior to issuance of transaction certificate. The cost of transaction certificate and the lab reports should be paid by the operator.

Export TC – There may be a delay in getting lab reports in case of risky or export consignments, in this case, a provisional TC has to be obtained by the operator and the export TC has to be obtained within 30 days from the date of issuance of provisional TC.

## **Step 11: Periodic surveillance**

During the surveillance period, ISCOP will execute an audit plan which consists of: - Unannounced on-site audit - Surveillance on-site audit - Annual sampling/ analysis plan based on the risk profile of the operator.

ISCOP has a comprehensive risk scoring for every operator, based on the risk score, surveillance audit will be planned. 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.

As per the requirements of NPOP the operation will be audited at least once annually as part of surveillance. 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, ISCOP may plan unannounced audit to check the level of compliance. 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 verification of any changes in certification requirements or the scope of your certification.

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## Step 12: Changes Affecting Certification

Any change associated with your process during the certified period should be informed in advance to ISCOP, if any changes are identified during surveillance, it will be treated as violation and the operation will be subject to sanction based on its severity.

It is also your responsibility to inform without delay, of any changes that might affect your compliance to the certification requirements. The 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 and other changes that may have impact on certification.

In case of such changes, the OSP must be updated and a duly signed and dated copy must be submitted detailing the changes. In case of such changes, additional audit in order to check the compliance with respect to NPOP standard may be organized at an additional fee. In that case you shall not represent and market the product(s) as organic resulting from such changes until further notification.

## Step 13: Renewal of 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, ISCOP India will expect you to submit the application form and OSP for the renewal of certification.

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

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 and appropriate measure will be taken.

## Step 14: Use of Marks and Licensing

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 ISCOP 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.



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Misuse of the trademark or incorrect reference to the certification or to IS COP by a client may lead to the implementation of appropriate measures such as reduction, suspension or withdrawal of certification.

## **Step 15: Complaints & Appeals**

Anyone can send a complaint to IS COP concerning documentary validation, other client, certified product, scope of 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 will be 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.

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,
- Be duly justified: new items that have not yet been brought to the attention must be provided. If the appeal is admissible, it will be processed by the IEI counsel of IS COP. The decision on appeal is communicated to the interested parties and the decision by IEI counsel 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.

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 us. These records must keep track of the appropriate action taken and these actions must be documented.

## **Step 16: End of Certification**

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 you can no longer claim organic status or manufacture and market the concerned products making reference to the certification. Certification of products already distributed and still on the market is not questioned.

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 IS COP to other certification body and followed by your application for NOC, IS COP 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.

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