



ISCOP

ISCNG-ICS-1222-7

Date: 21.12.2022

Notification to Operators regarding Transaction Certificate Process of ISCOP – Critical Observations and General guidelines for Corrective Action of all operators

Dear ICS Operators.

Indian Society for Certification of Organic Products takes this notification to reinforce Transaction Certificate application process for overall understanding of all operators. Please carefully read this notification and take necessary action in order **to avoid rejection of TC application or delayed processing of TC.**

We want to enlist some of the **common observations that are major non-compliances related to traceability.** It forces us to issue NC upon evaluation of TC application that eventually leads to delays and rejection of TC, particularly for ICS operators.

Our inspectors visiting you for sampling are finding difficulties establishing traceability of the stock aggregated in the warehouse. The following evidences are mostly missing.

1. **Stock movement register for receipt of stocks** from the farms that evidences data like date and time of receipt, aggregation lot identity, Village and authorized field officer cleared the lot from respective local aggregation point, etc.
2. The stocks in warehouse are mostly not identifiable by its respective Tracenet Stock Update identity on a farm-to-farm basis or even aggregation point basis. **Tagging for farm trace is missing.**
3. Composite sampling is tough given that the stocks are not identifiable for its aggregation plan. **Single TC volume optimization** depends on stock diversity and quality of tagging and the risk assessment for the season. Our inspectors are not in a position to validate the reasoning of TC volumes besides immediate forward trace connected to sale obligation.
4. **Evidences for the vehicle numbers** like pictures maintained both during uploading and offloading the stock from various aggregation points.
5. **Cultivation log with input approvals** for the stock on a farm-to-farm basis.
6. **Farm receipts and settlement evidences** as per the contractual obligations.
7. Registry of non-compliances or rejections, farm sanctions and corrective action report from the season's aggregation for which TC is requested.
8. Third party reports or internal reports that are available for evaluation besides CB's sampling and third-party testing decision.
9. Forward trace obligations for trade purposes.

INDIAN SOCIETY FOR CERTIFICATION OF ORGANIC PRODUCTS

VCS Enclave, Door no. 2/1, First floor, Nehru Street, B.R. Puram, Peelamedu, Coimbatore - 641 004.

Email: iscopcbe@gmail.com | www.iscoporgoertindia.com



ISCOP

ISCOP has been consistently facing difficulties with ICS to establish the product flow management structure during our regular renewal audits. **Harvesting and stock closure are the best time to audit your aggregation points, product flow structure and handling compliances.** It has been discouraging that mostly ICS fails to communicate the CB regarding harvest and stock closure indicative to TC process and enable no procedural lapse occur during stock aggregation. This proactive approach shall reduce TC processing time.

We take this notification to confirm that ISCOP shall treat all stock closures as 'manipulated' if we shall not evidence stock aggregation data and product flow at the warehouse point during sampling audit. **For all high-risk crops, ISCOP shall mandatorily conduct sampling audit, third party lab reports and aggregation evidences approval before approving TC. Blinded bulk stock in warehouse without tagging for farm level identity shall be treated as open market purchase** and the operator shall face sanction or termination based on vulnerability assessment and investigations on organic integrity.

It is notified that the **operators shall not claim the practices of other Certifying Bodies which they have been previously associated as excuses or even arguments.** ISCOP's policy to comply NPOP scheme shall be different from other certifying bodies and it is always at the best interest of both the parties, considering the operators long term business obligations and not just one season realization of stock.

ISCOP reiterates the condition for **Cotton TC approval as per ISO:IWA-32 testing of 7 genes from APEDA listed laboratories.** Please note that most ICS have their own preferred laboratories, yet for integrity purposes, ISCOP shall specify the laboratory for every sample and the laboratory may vary every time. Your cooperation for sample retention for a period of 2 years or based on shelf-life recommendation is mandatory.

Please note that ISCOP shall require a minimum of 30 days for investigating traceability before TC approval. But the timeline is conditional to type of crop and kindly note that perishables require **proactive harvest alert and sampling triggers** so that we can offer our **best cooperation for quick TC turnaround time.** Our cooperation for TC processing time shall fully depend on your proactive approach to communication of harvest, real time stock update, aggregation evidences and clear traceability. Any pressure on CB to issue TC without accomplishing compliances shall lead to the risk of rejection. We suggest that **any external recommendations from influential people for this purpose shall not yield success.** We value our operators and are concerned about your business. Please take a transparent approach and cooperative consensus for problem solving through corrective procedures.

INDIAN SOCIETY FOR CERTIFICATION OF ORGANIC PRODUCTS

VCS Enclave, Door no. 21, First floor, Nehru Street, B.R. Puram, Peelamedu, Coimbatore - 641 004.

Email: iscopcbe@gmail.com | www.iscoporgcertindia.com



ISCOP

TC reflects the engagement of CB with your organic system plan for the entire season. Poor communication, zero disclosures and engaging with CB just for the TC purpose by not updating the progress of the crop shall mean, the CB require detailed tracing before TC process can be completed. **Kindly consider proactive and purpose engagement for the entire season.**

Please contact us for any clarification or advocacy on stock traceability and TC application. We understand that organic integrity obligations are difficult, but kindly consider that your business obligations are equally critical. So kindly extend your best cooperation to serve you better.

Thanking you,

Yours truly,

Prof. Dr. S. R. Sree Rangasamy

President

Indian Society for Certification of Organic Products



INDIAN SOCIETY FOR CERTIFICATION OF ORGANIC PRODUCTS

VCB Enclave, Door no. 2/1, First floor, Nehru Street, B.R. Puram, Peelamedu, Coimbatore - 641 004.

Email: iscopcbe@gmail.com | www.iscoporgcertindia.com