

PROCEDURE ON AUDIT AND CERTIFICATION EVALUATION

1.0 Procedure for Audit of Grower Group/Crop Production unit

After receiving the application for audit of the grower group, CERT ID looks into the details of the grower group. Before visiting the grower group office, the Inspector/reviewer verifies whether the operator meets the requirements as per the NPOP standards, in order to be considered for group.

The operator is obliged to provide all the details of the Grower Group / Crop Production Unit accurately, in case of any update in the system or change in Organic System Plan should be immediately communicated to certification body. The obligation to provide information is mentioned in the certification agreement signed with the operator. ID-ORG-FF-18 Certification Agreement.

The basic criteria includes below:

- a. The ICS shall have a registered legal identity and have a constitution of the organization and shall be presented by an organizational chart.
Inspector, in addition to above shall document below mentioned points:
 - i. All the documentation for the ICS is maintained at the ICS office
 - ii. Proximity of the farmers from the ICS office
 - iii. Photograph of the ICS office along with audit team and authorized person from ICS
 - iv. GPS coordinates of the office
 - v. Complete Address of the office location
- b. Group certification is based on the concept of an internal Quality Management System comprising of the following: -
 - Implementation of the internal control system
 - Internal standards
 - Risk assessment
- c. The external inspection by the Certification Body shall be planned after internal inspections of all the farmers are carried out by the Internal Control System (ICS) twice annually
- d. Sampling plan for re-inspection is based on risk assessment and crops taken during the season.

The number of farms to be inspected is decided based on risk level, derived from initial review, previous audit result as well as information from the applicant. The Inspector receives the ICS manual, OSP and other related documents of the group well before audits for better understanding of the system and procedures followed.

The Inspector checks if documents are complete and correct and if they correspond with actual working practice. Is the internal control system working effectively? Is it a reliable system?

The following audit steps are part of an ICS audit checking:

- Evaluation of internal ICS manual
- Evaluation of internal organic standards
- Screening of random farm files
- Yield verification and Mass Balance check (ID-ORG-FF-68 Mass Balance Check)
- Traceability supported by financial flow
- Verification of the Maps to check resemblance to the actual field condition
- Focus on Sanctions: check of all noncompliance and sanctions identified by ICS
- Check the Approval Procedures
- Verification of farmers list
- Staff Qualifications and Training
- Internal Inspection
- Witness audit
- Interview with ICS manager on project overview

The inclusion of new member in the group will be considered only after the internal inspections are completed twice annually.

The Inspector shall also conduct the re-inspection of farmers which should always include an interview with the farmer. During the re-audit the following must be checked:

- Farm unit: number and details of farm plots
- Non-Organic fields
- Storage of inputs
- Livestock
- Post-harvest processing
- Storage of final products
- Cross check of all information with the ICS
- Cross check of purchase figures and yield estimates

- Assess the farmer's level of understanding of organic farming and the ICS procedures as well the assessment of qualifications of ICS field staff
- Different or event each internal inspector could be accompanied during a "normal internal inspection". To assess the quality of the internal inspection and to understand the actual procedures. The evaluation of training of internal inspectors and checking their overall knowledge of organic farming, the internal organic standards, ICS procedures etc.
- Audit of procurement locations may be done to also verify the product flow

2.0 Audit and Certification of all stages in Handling:

CERT ID follows the audit and certification of the whole production chain and clarifies what is applicable for various special cases. Each step in the handling of a product shall be inspected at least once annually. This implies that not only the farmers but also the storage units, the processing units, packaging etc. shall be inspected. Any exceptions to this shall be based on a documented risk assessment and be restricted to situations as identified. Any person who sells a product (raise invoice) shall be registered and certified. Normally this applies until the product is in its final package/has its final label.

3.0 Audit of Processing

The audit includes the audit of all inputs (ingredients, additives, aids etc), the recipes, the processing procedure, the produced/sold products, the storage facilities, the declaration of products, the pest management systems, sanitation/cleaning procedures, organic production protocols and accuracy of the audit system.

During the audit of the processing units, the following shall be taken care

- The Inspector shall verify that sufficient quantities of organic ingredients are used and that organic integrity is maintained through all stages of processing.
- The Inspector shall review all ingredients and their sources to ensure that the ingredients meet organic standards.
- The Inspector shall also review product formulation to determine if they meet labelling standards.
- Inspectors shall verify the existing record keeping system and evaluate whether it is adequate of tracking organic products.
- The Inspector shall conduct a traceability check and mass balance to track the product from receipt of raw material/ingredients, ingredient storage, through all stages of processing, packaging, labelling, warehousing, transaction certificates, shipping and sales of the finished product.
- The Inspector shall conduct a sample audit review, which consists of randomly choosing a finished product(s) either from a sales invoice, a product purchased or a product seen 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 point out the deficiencies if any in the product tracking system.
- The Inspector shall inspect all the subcontracted units annually.

4.0 Audit of Trading Unit

CERT ID will also certify operators who wish to get their trade operation as organic certified. They will have to procure certified organic or in-conversion produce and maintain proper and correct documentation on the sales and purchase. Trade operators will apply to CERT ID for certification and CERT ID shall follow the same procedures for certification as mentioned in the procedure manual. A physical audit of the site as well as verification of all trade documentation will be a mandatory part of the audit. The audits of traders are based on records and documents kept and updated by the operator. Traders must keep and update their own records based on the following points;

- Amounts of purchased products, indicating the origin and supplier of the product
- Amounts of organic products sold, indicating the buyers.
- Transaction certificates for each organic product transaction to check the traceability system.
- Traceability & Mass Balance

Operators must inform the CERT ID office if they are trading new organic products, or any changes. Certificates for the new products will be issued after audit and usual proceedings for the certification.

5.0 Audit for Chain of Custody

CERT ID will make necessary audits and verify all required documents like farm records, input registers, transportation details etc, related to the production or processing of the product. CERT ID will verify the entire chain of production and processing, from farm until marketing. All parties involved in the chain of production of a certified product will have written agreements with clear responsibilities.

If steps in the production/processing chain have been subcontracted to organizations that have been certified by other accredited audit agency under NPOP guidelines, CERT ID will request for information to ensure, that the process/part of production subcontracted was done under the NPOP guidelines within 30 days of receipt of the issue. Organic certificates will only be issued by CERT ID after being convinced of the organic integrity of the whole chain of production.

CERT ID shall not issue any license to use its certification mark or issue any certificate for any products unless it is assured of the chain of custody of the product where steps in the production chain have been certified by other accredited Certification Bodies under NPOP as per the National Standards of Production.

6.0 Audit of Wild Products / Non-Cultivated Products

CERT ID will apply all the relevant criteria to the Audit and Certification of wild production namely;

Collecting areas

Organic wild collection will be done only in well-defined collecting areas. To verify that the area of collection is properly identified on appropriate maps issued by the concerned Government Authorities. The borders of the collecting areas will be known by all collectors. The collecting area must not have been treated with any non-allowed inputs as per organic regulations for at least three years. The collecting areas need to be free of possible contamination sources. Maps of the collecting areas will be demarcated to locate potential sources of contamination such as industry, roads, quarries, towns, waste deposits etc. The outer borders of the collecting areas will be marked. However, wherever community rights are recognised under Forest Rights Act, 2006, Gram Sabha letter can be considered for verification of collection area by the community.

All purchasing centre and processing facilities will be clearly indicated on the map. All major sources of potential contamination will also be clearly indicated on the map. The responsible operator shall be dealt with as any other certified party. CERT ID will insist the operator to issue instruction to the collectors, to define the area of collections and inform them about the standards and other requirements of collection.

The collectors should sign statements that they have followed the instructions. The operator should have records of all collectors and quantities brought from each collector and same shall be verified by the Inspector. Any local agents (middleman) must be properly contracted by the operator. During onsite audit CERT ID Personnel apart from normal audit will visit to the operator and the facilities Including:

- Visits to an appropriate portion of the certified area
- Visits and interviews of the concerned in the supply chain such as collectors, local agents, landowners and other parties (environment agencies, NGOs etc.).

In case of cultivation by the operators in the forest area recognized under Forest Rights Act 2006, the verification of compliance shall follow the crop production standards given under Appendix 1 of chapter 3 of this document.

7.0 Audit of Input Approval

CERT ID have documented procedures for evaluating the product's (commercial input) compliance with the NPOP standards as mentioned in Appendix 1 of chapter 3 of NPOP Standards under Annex 1, 2 and 3.

The approval & Audit procedure include the following:

- When an input is to be evaluated it will be investigated by CERT ID to see whether it fulfils the following six criteria mentioned in Aneex-3 of Appendix 1 of Chapter 3 of NPOP standard. An input must fulfil all 6 requirements before it can be accepted as suitable for use in organic agriculture as mentioned below:
 - 1) Necessity
 - 2) Nature and Way of Production
 - 3) Environment
 - 4) Human Health and Quality
 - 5) Ethical Aspects - Animal Welfare
 - 6) Socio Economic Aspects
- Annual visit for verification of the necessary documents of the producer related to composition of the product manufactured.
- Period for which approval is granted i.e 1 year from the issuance of the certificate.
- The audit method includes;
 - i) Visits of the facilities of production, storage facilities, packaging facilities.
 - ii) Production system of operator
 - iii) Review of records and documents
 - iv) Interview with responsible persons;
- Assessment of risk is made at raw material receiving stations, processing line used for organic input production ingredient and finished product warehouse, at sites of production and packaging.

- The Inspector assesses the knowledge base of the personnel involved, equipment, buildings record keeping systems, etc are in place to produce according to organic standards.
- The Inspector assesses whether the operator understands the requirement of NPOP standards as mentioned in Appendix 1 of chapter 3 of NPOP Standards under Annex 1, 2 and 3 and is committed to their application.
- The reports of Inspector, evaluator, and all the relevant documents are scrutinized by reviewer in Technical review and transmit to the same along with recommendations for consideration by the Certification Committee.
- The Certification Committee considering all aspect of production and compliance to the standards, take decisions on the approval of input product and specify in the period for approval of the products.
- CERT ID will issue clear statement of the nature/guarantee of the approval of the system; it will not guarantee the efficacy of the product.
- The manufacturers are required to report changes in the composition or other relevant factor immediately to CERT ID for consideration and approval.