INDEX CONTROL MEASURE EU

A. Application Review
B. Audit Processes
c. Technical Review and Certification Decision Process
D. Certification Decisions and Post Certification Changes & Renewals
E. Complaints and Appeals Process
F. Policy of sanctions and disciplinary measures
G. SANCTION CATALOGUE (EU)
H. PROCEDURE FOR GROWER GROUP CERTIFICATION PROCESS
I. SANCTION CATALOGUEFOR GROUP MEMBER REGISTERED IN GROWER GROUP
J. Risk Based inspection planning procedure.
K. Procedure For Sampling, Sample Preparation and Retention
L. Procedure for Exceptions and Derogations
M. Procedure for investigation and complaint

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QUALITY MANAGER	COO

A. Application Review

1. Purpose

This procedure establishes a system for data acquisition, review, price estimation, information leaflets, follow-up, presentation, amendments, acceptance and signing of quotations (and or contract agreements) for the certification process of a client's management system.

2. Scope

The scope of the procedure will cover the handling of all requests for organic certification as per Regulation (EU) 2018/848. The following link provides the production rules of Regulation (EU) 2018/848 and its supplementary acts in 24 languages, including French, Spanish, English, and Portuguese. https://eur-lex.europa.eu/eli/reg/2018/848/oj

Official communication language of MS ASPL is English. MS ASPL shall use English language for communication with applicants and operators.

The EU Certification procedure and Control measures of MS ASPL uploaded on the web portal are in English. If an operator or client has trouble understanding the control measure or certification procedure, they should send an email to info@agrolandgroup.com.

3. References

ASPL-CD-QM-01 - Quality Manual

4. Responsibilities

Business Development Manager/ Senior Business Development Manager (or business development team) shall be responsible for generating and handling inquiries, price estimation, information leaflets, follow-up, presentation, amendments, and acceptance of quotations for the certification process.

Quality Manager shall be overall responsible for reviewing and monitoring adherence to this procedure.

Initial Technical Reviewer: - The Initial technical reviewer shall evaluate the application, organic management plan and associated documents as per the updated regulations (EU) 2018/848. After the result of the evaluation the outcome shall be communicated to the operator, business department, and Audit manager.

The accounts department of MSASPL (in coordination with Operation Team) shall be responsible for all financial matters like invoicing, payment collection, and shall update accounting related matter to the management and operation team.

5. Procedure for the handling of the application, price estimation

5.1 Receipt and Recording of Enquiries

Upon generation of interests (either through e-mail, telephonic and other communication means), the company is contacted and procedure is followed as below. Details of enquiries are recorded (either on record or on electronic devices) and tracked by Administrator/Operation coordinators/business development team for follow-up further.

5.2 Processing of enquiries

In the next step then the potential clients are provided with the application form, publicity material (like ASPL Website/E-Mail) outlining information about the Standard and other MS Agroland Services Pvt. Ltd. can provide. The application form is designed and developed for the applicant organization to provide the necessary information to enable it to establish the following:

The desired scope of the certification.

Relevant details of the applicant organization as required by the specific certification scheme, including its name and the address(es) of its site(s), its processes and operations, human and technical resources, functions, relationships and any relevant legal obligations;

Farming- Crop/Products, Area in hectare, Parallel production, member of group of operators or Single legal entity.

Processing – Products, Area of the processing units and storage (in sqm), Parallel production

Exportation and Handling – Products Feed Site map, neighbors and their crops, water drift, Air drift, low lying or high, buffer chemical at site, water source, storage, crops, crop rotation use of compost, seed plant material, treatment, Quantity reconciliation, People basis training, location of sites and available infrastructure on the site Identification of outsourced processes used by the organization that will affect conformity to requirements;

The client may be then followed up by Business Development team for returning back the completed application form. On receipt of a completed Application Form/ will be checked by Business Development to ensure that the necessary information has been provided to enable a quotation to be prepared. The draft quote proposal shall be placed before Quality Manager for review to ensure that.-

Proposed Scope of Certification are precisely defined Client's products/processes are within the accredited scope of MS Agroland Services Pvt. Ltd. and that MS Agroland Services Pvt. Ltd. (Agrocert). has qualified and competent team of auditors to service the client within the proposed scope Refer to current list of approved auditors for auditors current capabilities.

Based on this initial review , MS Agroland Services Pvt. Ltd. (Agrocert). has determined that they have the competent (having knowledge of audit principles, practices, techniques, reporting requirements, certification processes, the terminology used in the client business sector) certification decision-makers.

Other laid conditions of the MS Agroland Services Pvt. Ltd. (Agrocert). policies and procedures are adhered to and complied with. Information are having been collected, reviewed and recorded for contract including threats to impartiality on **Risks to Impartiality - Analysis Results**

Where MS Agroland Services Pvt. Ltd. (Agrocert). choose to decline an application the reasons for this will be documented and made clear to the site. If the scope of the client's product's/processes is such for which MS Agroland Services Pvt. Ltd. (Agrocert). has not been granted accreditation by the Accreditation Body to perform Certifications, the client shall be notified. This shall be further updated on record held and maintained with the designated Administrator/Operation Coordinator.

The prepared and finalized (after a final review of Quality Manager and any amendments thereof) quote proposal shall be shared with client representative along with certification agreement either through e-mail or courier or manually handed over. The business development team (or any one of them) shall follow up with the client further as per details documented in sub-section-6 of this procedure. The client shall be additionally advised to go through MS Agroland Services Pvt. Ltd. (Agrocert). 's service protocol shared on the e-mail along with the Certification Agreement so that the client knows the rules of Certification prior to signing the certification agreement with MS Agroland Services Pvt. Ltd. (Agrocert).

Certain clauses of the certification agreement as mentioned in sub-section 7 of this procedure may not be applicable when the client grants contract work by awarding the tender.

6. Quote Proposal Follow up

Business Development Manager/Administrator or Operation Coordinator shall follow up with the potential client after the quote will be sent to ensure receipt and determine if there are any questions or comments. If a presentation of the quotation is requested, appropriate arrangements shall be made to accommodate the request.

7. Quote Proposal Amendment

If a quotation requires amendment, the information shall be modified as required and a new quote prepared and sent to the potential client. If the amendment results in modifying current established fee schedules or in man-days then approval from the Business Development Manager/Managing Director shall be required prior to the new quote being sent. Terms and Conditions relating to certification rule and procedures stated in the Certification agreement shall be considered 'not negotiable' in order to ensure protection of policies and principles contained in MS Agroland Services Pvt. Ltd. (Agrocert). 's and to ensure continued compliance to ISO 17065: 2012 standard.

8. Master Agreement for Certification Services

On acceptance of the by the applicant organization, the client will be requested to agree and duly sign a legally enforceable Certification Agreement. This Agreement shall cover all the sites of the clients covered by the scope of certification. Further, this agreement shall also cover of MS Agroland Services Pvt. Ltd. (Agrocert). in India. Any alterations to the Certification Agreement shall be permissible to altering of payment terms & conditions in the agreement provided reviewed for approval by the COO. Other parts of this agreement with respect to certification rules shall be considered Non-negotiable policy. The client shall be advised of acceptance of the Agreement, or the reasons for rejection. On acceptance, The Certification Agreement shall be signed by the COO or by designated authority.

B. Audit Processes

Purpose

To define the process for auditing the client's management system against the requirements of the applicable audit criteria.

Scope

Pre-audits, document reviews, initial audits (registration in case of farming, certification audit and Annual/ Surveliance audit in case of processing, feed, wild collection , trading and handling), Investigation, re-certification, special Investigation, extension, short-notice and transfer audits and all other type of audits. Applies to Regulations (EU) 2018/848 audits.

Responsibility:

The Auditor(s) shall ensure audit is conducted in accordance with this process.

Input

Assignment letter

Output:

Audit report, Audit checklist and scope certificates

KPI

- Auditor performance
- Client Satisfaction data
- Results of technical review (# of defects report)

1.0 Audit Process

1.1 Assignment to Auditor

Assignment letter issued to the auditor along with reviewed application packet (ASPL-CD-FR-38 (EU) – Application of crop production, ASPL-CD-FR-39 (EU) -Organic Management Plan of crop production, ASPL-CD-FR-41 (EU) -Application of group of operators, ASPL-CD-FR-42 (EU) ASPL-CD-FR (EU) -42 -Organic management plan -Group of operators, ASPL-CD-FR-44 (EU) – Application of processing , ASPL-CD-FR-45 (EU) – Organic Management Plan -Processing, ASPL-CD-FR-47 (EU) -Application of Trading and Handling , ASPL-CD-FR-48 (EU) – Organic Management Plan- Trading and Handling , ASPL-CD-FR-50 (EU)- Application of Feed, ASPL-CD-FR-51 (EU) -Organic Management Plan-Feed, ASPL-CD-FR-53 (EU) - Application of wild collection, ASPL-CD-FR-54 (EU) – Organic Management Plan -Wild

collection) to certify the operators or groups of operators. MSASPL shall ensure that the following details submitted by the operator and group of operators.

(a) Application organic management plan and associated documents in the form of a signed declaration, setting out:

i. A description of the organic and/or in-conversion production unit and, where relevant, of the non-organic production units and, the activities to be performed in accordance with Regulation (EU) 2018/848.

ii. The relevant measures to be taken at the level of the organic and/or in-conversion unit and/or premises and/or activities to ensure compliance with Regulation (EU) 2018/848.

iii. The precautionary measures to be taken in order to reduce the risk of contamination by non-authorised products or substances and the cleaning measures to be taken throughout the stages of production, preparation and distribution.

(b) A confirmation that the operators or groups of operators have not been certified by another control body in relation to activities carried out in the same third country regarding the same category of products, including in cases in which operators or groups of operators operate at different stages of production, preparation or distribution.

(c) A confirmation by the members of a group of operators that they have not been certified on an individual basis for the same activity for a given product covered by the certification of the group of operators to which they belong.

(d) A signed undertaking by which the operators or groups of operators commit themselves.

i. To give the access of all parts of the production units and all premises for control purposes to MS ASPL, as well as to the accounts and relevant supporting documents.

ii. To provide any information necessary for the purposes of the controls of MSASPL.

iii. To submit, when requested by the MSASPL, the results of its own quality assurance programmes.

iv. To inform buyers of the products in writing and without undue delay, and to exchange relevant information with the MSASPL, in the event of a suspicion of non-compliance has been substantiated, that a suspicion of non-compliance cannot be eliminated, or that non-compliance that affects the integrity of the products in question has been established.

v. To accept the transfer of the control file in case of a change of control authority or control body or, in the case of withdrawal from organic production, the keeping of the control file for 5 years by the last control authority or control body.

vi. To inform immediately the control authority or control body in the event of withdrawal from organic production.

vii. In the event that the subcontractors of the operators or groups of operators are subject to controls by different control authorities or control bodies, to accept the exchange of information among those control authorities or control bodies.

viii. To perform the activities in accordance with the organic production rules.

ix. To accept the enforcement of the corrective measures established by the MSASPL in the event of non-compliances.

NOTE-01

1 . Before certifying operators or groups of operators MSASPL shall verify during the physical on the spot inspection that:

i. Operators or groups of operators comply with Chapters II, III and IV of Regulation (EU) 2018/848 and Article 36 of that Regulation.

ii. Where the operators or groups of operators subcontract any of its activities to third parties, both the operators or groups of operators and the third parties to whom those activities have been subcontracted, have been certified by recognised control authorities or control bodies confirming that they comply with Chapters II, III and IV of Regulation (EU) 2018/848 and Article 36 of that Regulation, unless the operators or groups of operators inform the relevant control authority or control body that they remain responsible as regards organic production and that they have not transferred that responsibility to the subcontractor. In such cases, MSASPL shall verify that the subcontracted activities comply with Chapters II, III and IV of Regulation (EU) 2018/848 and Article 36 of that Regulation in the context of the control activities it carries out in respect of the operators or groups of operators that have subcontracted their activities.

2. Operators or groups of operators that were previously certified by another control authority or control body, MSASPL shall assess the following information to be transmitted by the previous control authority or control body:

i. The status and validity of certification, including cases of scope reduction, suspension and withdrawal as referred to in International Organisation for Standardisation (ISO) standard ISO/IEC 17065.

ii. Reports of inspection carried out in the preceding 3 years.

iii. The list of non-compliances and the measures put in place to address them, and the fact that all non-compliances were addressed.

iv. Derogations granted or requests for derogation being processed by the previous control authority or control body.

v. Information relating to any ongoing dispute relevant for the certification of the operators or groups of operators.

3. If the previous control authority or control body does not transmit the information as required in Article 21(5) of this Regulation to the MSASPL or in case of doubts concerning the information transmitted, MSASPL shall not issue the certificate referred to in point (b)(i) of Article 45(1) of Regulation (EU) 2018/848 to operators or groups of operators until this MSASPL has eliminated their doubts by other means of control.

4. MSASPL shall not certify operators or groups of operators that have been withdrawn by their previous control authority or control body in the last 2 years, unless the recognition of the previous control authority or control body has been withdrawn by the Commission in accordance with Article 46(2a) of Regulation (EU) 2018/848 for the specific third country and category of products.

MSASPL Auditor make the sampling strategy, procedures and methodology, control methods and techniques, including laboratory analysis, testing and interpretation and evaluation of results and consequent decisions referred the ASPL-CD-PR-34 (EU) – Procedure for sampling , method used for sampling and selection of laboratories for sample analysis & ASPL-CD-PR-31 (EU) Procedure for sampling , sample preparation and retention.

MSASPL Audit Manager and Auditor shall do the risk assessment as per the ASPL-CD-PR- 44 (EU) -Procedure for risk assessment , for carrying out physical on-the-spot inspections and sampling

MSASPL shall also verify the operators and group of operators , verification of the appropriateness of methods of sampling and of laboratory analysis, testing and diagnosis and also for groups of operators, the effectiveness of the system for internal controls.

5. Written records of controls

MSASPL auditor shall verify compliance with Regulation (EU) 2018/848 of operators and group of operators . Those records may be on paper or in electronic form. MSASPL shall keep these records for 5 years from the day of the decision on certification by the MSASPL. Those records shall contain in particular:

i. A description of the purpose of the controls.

ii. The control methods and techniques applied.

iii. The outcome of the controls, in particular the results of verifying the elements listed in Articles 11 and 12 of this Regulation (EU) 2018/848.

iv. Actions that the operator or group of operators concerned is required to take as a result of the controls carried out by the MSASPL, with an indication of the deadline to take action.

The written records shall be countersigned by the operator or the inspected member of the group of operators as confirmation of their receipt of that written record. A copy of that record shall be kept by the operator or the inspected member of the group of operators either on paper or in electronic form.

6. Checks of documentary accounts

MSAPL auditor shall do physical on-the-spot inspection for traceability check and a mass balance check of the operator or group of operators carried out by means of checks of documentary accounts. MSASPL shall perform the traceability and mass balance check according to the standard template documented in the written record. Traceability check and mass balance check, the selection of products, groups of products and period under verification shall be made on a risk basis.

The traceability check shall cover the following elements justified by appropriate documents including stock and financial records:

(a)the name and address of the supplier and, where different, of the owner or the seller, or the exporter of the products;

(b)the name and address of the consignee and, where different, of the buyer or importer of the products.

(c)the certificate of the supplier.

(d)the information referred to in the first paragraph of point 2.1 of Annex III to Regulation (EU) 2018/848.

(e)the appropriate lot identification.

The mass balance check shall cover at least the following elements justified by appropriate documents including stock and financial records:

(a)the nature and the quantities of products delivered to the unit and, where relevant, of materials bought and the use of such materials, and, where relevant, the composition of products;

(b)the nature and the quantities of products held in storage at the premises;

(c)the nature and the quantities of the products that have left the unit of operator or group of operators to the consignee's premises or storage facilities;

(d)in case of operators who buy and sell the product(s) without physically handling the product(s), the nature and the quantities of products that have been bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees;

(e)the yield of the products obtained, collected or harvested over the previous year;

(f)the actual yield of the products obtained, collected or harvested over the current year;

(h)any losses, increase or decrease in quantity of products at any stage of production, preparation and distribution;

(i)organic or in-conversion products that are sold on the market as non-organic.

1.2 General

Once the assignment letter is received the Auditor shall prepare the audit plan in accordance with the requirements of Regulations (EU) 2018/848.

1.3 Opening Meeting

Upon arrival at the client's site or farm, the Lead Auditor shall chair the opening meeting; details are provided by work instruction;

1.4 Collecting and verifying information

During the audit, the team members shall collect and record objective evidence to demonstrate that the client's system is both implemented and effective. Information relevant to the audit objectives, scope and criteria (including information relating to interfaces between functions, activities and processes) shall be collected by appropriate sampling and verified to become audit evidence. Such evidence shall be obtained from interviews, review of documentation and records, observation of

processes and activities and conditions in the processes audited. Records shall identify personnel interviewed.

MS Agoland Services Pvt. Ltd. Shall ensure that during Annual/ Survelliance audit verification officer/ auditor verifies on-site that previously submitted corrective actions have been, and remain, fully implemented auditor is also verified that any changes in organic standards and MSASPL requirements have been effectively implemented by the operators.

1.5 Audit Progress Assessment and Exchange of Information

1.5.1 The Lead Auditor will ensure that there are regular meetings with the team throughout the course of the audit to ensure that issues identified are discussed and if necessary the course of the audit is modified to accommodate any changes necessary. These issues should be brought to the attention of the client's representative at the time that they are identified.

1.5.2 Where the available audit evidence indicates that the audit objectives are unattainable or suggests the presence of an immediate and significant risk (e.g. safety), the Lead Auditor shall report this to the client and to the MS Agroland Services Pvt. Ltd Office to determine appropriate action. Such action may include reconfirmation or modification of the audit plan, changes to the audit objectives or audit scope, or termination of the audit. The Lead auditor shall also:

- Maintain the information collected to this point in time;
- Provide the client with a finding report of non-conformity(ies) leading to the interruption of the audit, if applicable.
- Indicate in the finding audit report the reason for the interruption of the audit.

1.5.3 The Lead Auditor shall conduct a daily debrief meeting as necessary to discuss the progress of the audit and the concerns with the client. As a result of the meeting, the audit plan may be modified.

1.5.4 The Lead Auditor shall review with the client any need for changes to the audit scope which becomes apparent as on-site auditing activities progress and report this to the MS Agroland Services Pvt. Ltd Office.

1.6 Preparing the Finding Report

The finding report shall be prepared and issued by Auditors during the closing meeting; if no internet connection is available the report shall be prepared and issued off-line. The audit team may identify opportunities for improvement but shall not recommend specific solutions.

1.6.1 Audit Plan – As executed

As deemed necessary, the Lead Auditor amend the original version of the audit plan to reflect the real timing and sequence of the audit events

1.6.2 Nonconformities

1.6.2.1 General

- There are three types of nonconformities – Critical ,Major and Minor
- Non-conformity shall be substantiated by objective evidence or absence of objective evidence such as: witnessed, recordable, verifiable, and quantitative collection of facts
  - The Lead Auditor, shall review the findings and record them
  - For each nonconformity, the author shall identify the following:
- Finding: a clear description of the nature of the nonconformity; it could be in terms of insufficient implementation, unsuitability, inadequacy, ineffectiveness, etc. or in terms of lack identification of the evidence which conflicts with the requirement.
- Requirement: The quote of the requirement of the audit criteria against which the nonconformity is being reported. This may include a reference to the audit criteria and/or the client's documentation. In the case of an Integrated Management System audit, it may refer to more than one audit criteria and/or other normative document
- Objective Evidence: The objective evidence observed that supports the statement of nonconformity: the specific occurrence, supported by the identification of the evidence collected (e.g. - direct reference to the document being reviewed, the work station, etc.)

1.6.2.2 Critical Non conformity:

Critical non conformity: The precautionary measures are not proportionate and appropriate and the controls that the operator has put in place are inefficient according to the assessment by the MSASPL

- The non-compliance affects the integrity of the organic or in-conversion product.

- The operator fails to correct previous major non-compliances or repeatedly fails to correct other categories of non-compliances.
- There is no information from the traceability system to locate the affected product(s) in the supply and the products cannot be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production.

1.6.2.3 Major nonconformity

Major non conformity: failure to fulfil one or more requirements of the management system that raises doubt about the capability of the management system to achieve the expected outcomes or to effectively control the process for which it was intended.

Characteristics of a major nonconformity are:

a) An extensive breakdown or the absence of evidence of effective implementation of a process and/or documented procedure required by the applicable audit criteria and expected outcome.

b) Probable shipment of non conforming product to the client

c) The absence of, or total systemic breakdown of, a management system process specified in the applicable audit criteria; or any nonconformity where the effect is judged to be detrimental to the integrity of the product, processes, or service.

d) The absence of, or failure to implement and maintain, one or more management system requirements; or a situation which would, on the basis of objective evidence, raise significant doubt as to the capability of the management system to achieve its policy and objectives.

e) If there is a significant doubt that effective process control is in place, or that products or services will meet specified requirements;

f) A number of minor nonconformities associated with the same requirement or issue could demonstrate a systemic failure and thus constitute a major nonconformity.

g) A situation that is a significant real or imminent threat to the environment

h) A situation that is a significant real or imminent threat to the to human health and safety

i) A situation that could lead to a major compliance issue (compliance processes compromised, resulting in fines and/or sanctions from regulatory agencies).

j) The precautionary measures are not proportionate and appropriate and the controls that the operator has put in place are inefficient according to the assessment by the MSASPL.

k) The non-compliance affects the integrity of the organic or in-conversion product.

l) The operator did not correct in a timely manner a minor non-compliance.

m) The traceability can locate the affected product(s) in the supply chain and the product can be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production

Note: A major nonconformity usually represents a material risk to product quality, human health and safety, or impact to environment, and raises doubt about the capability of the management system to achieve its policy and objectives.

1.6.2.4 Minor nonconformity

Minor non conformity: failure which does not impact the capability of the management system to achieve the expected outcomes.

Characteristics of a minor nonconformity are:

a) A failure to fully satisfy a requirement of the audit criteria with a documented procedure, when required.

b) a situation that is a minor real or potential threat to the environment

c) a situation that is a minor real or potential threat to the to human health and safety

d) a situation that could lead to a minor compliance issue (minor issues not compromising overall compliance processes and resulting in no significant fines and/or sanctions from regulatory agencies)

e) A breakdown in the effective implementation of a documented procedure in isolated incidents.

Notes-2

- A minor nonconformity usually does not represent a material risk to product quality, human health and safety, or impact to environment, and does not raise doubt about the

capability of the management system to achieve its policy and objectives.

- A number of minor non conformities associated with the same requirement or issue could demonstrate a systematic failure and thus constitute a major non conformity.

1.6.2.5 Opportunities for Improvement (OFI)

- Definition: an opportunity to enhance the existing work process/practice/method that conforms to the requirement of the audit criteria and/or of the organization, but may not represent the current state-of-the-art approach, or best practice, but may represent a potential for a nonconformity.
- The auditor should identify the area for improvement but cannot offer a specific solution
- Audit findings, however, which are nonconformities, shall not be recorded as opportunities for improvement.

1.6.2.6 Time line for submission of corrective action plans & implementation of corrective actions

1.6.2.6.1 Corrective Action Plans

All corrective action plans, including evidence of correction shall be submitted within 30 calendar days from the last day of the activity unless the client's certificate expires prior to that date; in such case the corrective action plan shall be submitted prior to certificate expiring.

1.6.2.6.2 Minor Nonconformities

For minor nonconformities, all corrective actions shall be implemented (including verification of effectiveness) within 90 calendar days from the last day of the activity. Effective implementation of corrections and corrective actions will take place at the next visit.

1.6.2.6.3 Major nonconformities

For major nonconformities, all corrective actions shall be implemented (including verification of effectiveness) within 30 calendar days from the last day of the activity unless the client's certificate expires prior.

An onsite special visit to close out majors will always be scheduled unless certificate authority has approved it to be offsite. The date for scheduling the special visit shall be within 90 days following the audit or prior to certificate expiry whichever comes first.

1.6.4 The findings are addressed in finding report ASPL-CD-FR-26 and share with the client during the closing meeting for corrective action.

1.6.5 In case auditor is unable to provide the documented finding report during the closing meeting, the same will be sent with in 24 hrs.

1.6.2.6.4 Critical Noncompliance's

Corrective actions shall be implemented (Including verification effectiveness) within 15 calendar days from the last day of the activity unless the client's certificate expires prior.

An onsite special visit to close out critical will always be scheduled unless certificate authority has approved it to be offsite. The date for scheduling the special visit shall be within 30 days following the audit or prior to certificate expiry whichever comes first.

1.6.4 The findings are addressed in finding report ASPL-CD-FR-26 and share with the client during the closing meeting for corrective action.

1.6.5 In case auditor is unable to provide the documented finding report during the closing meeting, the same will be sent with in 24 hrs.

1.7 Closing Meeting

Prior to the closing meeting, the audit team under the responsibility of the audit team leader shall:

a) review the audit findings, and any other appropriate information obtained during the audit, against the audit objectives and audit criteria and classify the nonconformities;
b) agree upon the audit conclusions, taking into account the uncertainty inherent in the audit process;
c) agree any necessary follow-up actions;
d) confirm the appropriateness of the audit programme or identify any modification required for future audits (e.g. scope of certification, audit time or dates, Investigation

frequency, audit team competence).

Prior to leaving the client's site, the Lead Auditor shall undertake the closing meeting where audit findings are shared with the client, details are provided by work instructions.

2.0 Additional requirements

2.1 Registration audit

2.1.1 Registration audit is performed on farming as per NPOP, COR , NOP and EU standard and includes the collection of basic information regarding the testing of plant material, seed, soil, water and product.

2.1.2 The audit shall include:

- The review of the client's status and understanding regarding requirements of the standard, big picture about their commitment towards organic standards, in particular with respect to the identification of key performance or significant aspects, processes, objectives and operation of the management system;
- The audit of the client's farm documentation;
- The evaluation of the client's location and site-specific conditions;

2.1.3 The collection of the necessary information regarding the scope, site map, neighbors and their crops, water drift, air drift, low lying or high, buffer chemical at site, water source, storage, crops, crop rotation, use of compost, seed/ plant material sources and treatment, quantity reconciliation, people basis training, records of seed treatment, sowing, irrigation, harvesting and storage, farmer file, farmer agreement, package of practice and sampling procedure.

2.1.4 The results of the this audit are required and noted in findings report.

2.1.5 After one year of registration audit, conversion audit (s), conversion audit 1 and/ or conversion audit 2 as required by applicable standards, will be planned at the time of harvesting and verify the stock reconciliation on the 2nd crop.

2.1.6 Based on the result of the registration audit and conversion audit (s), full organic audit is planned.

2.2 Certification Audit

2.2.1 For processing and trading, the Certification audit shall be carried out at the client's premises in order to achieve the objectives stated above. The evidence demonstrating that Certification audit objectives are fully achieved shall be provided. Exceptional circumstances can include very remote location, short seasonal production.

2.2.2 The Certification audit shall include:

- The review of the client's status and understanding regarding requirements of the standard, big picture about their commitment towards organic standards, in particular with respect to the identification of key performance or significant aspects, processes, objectives and operation of the management system;
- The audit of the client's management system documentation including purchasing records, transaction certificates, transport records, packing records and dispatch records; including stock reconciliation.
- The evaluation of the client's location and site-specific conditions;
- The collection of the necessary information regarding the scope, handling of material i.e. chain of custody, identification, segregation, change over procedure in case of parallel production, packing, storage and dispatch including container fumigation, pallet fumigation; testing of the product in approved lab.

2.3 Annual/ Surveillance audits

Operator shall submit their intention to maintain the certification no later than 06 months prior to the end of the period of certification and complete the re-certification documents at least two months in advance

MS Agoland Service Pvt. Ltd. Shall conduct the audit as per the updated documents received from the operator in a manner to complete the re-certification process with in the 12 months period.

MS Agroland Services Pvt. Ltd maintains certification based on demonstration that the client continues to satisfy the requirements of the Organic Standard. It may maintain a client's certification based on a positive conclusion by the audit team leader without further independent review and decision, provided that

a) For any major nonconformity or other situation that may lead to suspension or withdrawal of certification, the certification body has a system that requires the audit team leader to report to the certification body the need to initiate a review by competent personnel and different from those who carried out the audit, to determine whether certification can be maintained;

b) Competent personnel of MS Agroland Services Pvt. Ltd monitor its Investigation activities, including monitoring the reporting by its auditors, to confirm that the certification activity is operating effectively.

c) Annual/ Surveillance activities shall include on-site auditing of the certified client's management system's fulfilment of specified requirements with respect to Regulations (EU) 2018/848 to which the certification is granted.

2.4 Investigation audits

Investigation audits are on-site audits, but are not necessarily full system audits, and shall be planned together with the other activities so that the certification body can maintain confidence that the certified client continues to fulfil requirements.

2.5 Audit Report Package

The audit team leader is responsible for the preparation of report's content as per the requirements. The audit report shall provide an accurate, concise and clear record of the audit to enable an informed certification decision to be made. The audit team leader need to submit an accurate a audit report along with the audit checklist, audit notes, any collected evidence or sample etc. as audit report package to the office of certification body for technical review and certification decision.

C. Technical Review And Certification Decision Process

Purpose

This document describes the process for the independent review of activity reports in order to approve recommendations for granting, extending, maintaining, renewing, suspending, reducing the scope of, or withdrawing certification.

Scope

This applies to all reports submitted in relationship with certification activities. Review of other reports, such as pre-audit reports, is left at the discretion of the COO.

Responsibility

- Competent and independent Technical Report Review personnel (Technical Reviewer) are responsible for the technical review of the report as per the requirements specified in Section 1 (Refer below-mentioned flow diagram),
- Competent and independent Certification Authority personnel (COO/ Certification Committee)

are responsible for making a decision with regards to the client's certification, based on the results of the technical review, recommendation of the technical reviewer and evidences submitted and the recommendation made by the Lead Auditor, as per the requirements specified in Section 2 (Refer below mentioned flow diagram).

Definitions

- Competent personnel: Personnel which have demonstrated the necessary competence (relevant education, experience and training) for the function, as it relates to the scope of the activity related to the report being reviewed.
- Independent personnel: Personnel which have not been involved with the auditing activity under review.

Section 1 - Technical Review process

Section 2 - Certification Decision Review Process

D. Certification Decisions and Post Certification Changes & Renewals

1. **Purpose**

   This procedure intends to establish a system for certification decision, grant extension of scope, modification/ amendment/ changes/ renewal/ reduction/ suspension/ withdrawal, and transfer of certification related to organic standards/schemes in compliance with ISO 17065: 2012 Standard.

2. **Scope**

   The procedure is applicable to organic certification as per regulations (EU) 2018/848.

3. **References**

4.1 Responsibilities

Quality Manager together with other member of the certification committee shall be responsible for grant of the certification decision, renewal, extension and amendment/ changes of scope.

Certification Manager shall be sole responsible for authorization for approving suspension, reduction and withdrawal of certificates on basis of recommendations of certification decision committee which shall be binding.

COO shall be responsible for signing of the certificate of compliance.

Designated Technical Reviewer (a designated senior audit manager) shall be responsible for technical review. As a member of certification decision committee, he/she shall participate in the certification decision.

4.2 Certification Decision Apparatus

All certification decisions shall be reviewed and granted by the Certification Committee designated and constituted for the purpose. It shall retain authority of its decisions relating to certification, including the granting, maintaining, recertifying, expanding and reducing the scope of the certification, and suspending or withdrawing the certification.

The Certification Committee constitutes of the following 03 members-

1. COO
2. Quality Manager
3. Certification Manager

Certification Committee members shall not be involved in the audit and technical review process of the site for which the certification decision is required to be taken.

Presence of the COO or a competent technical person is must for decision i.e. issuance or grant of the certificate. This is required for the technical aid in the decision making.

Presence of the Certification Manager or a competent technical person is necessary:

- in case of extension of scope/services where existing members do not have the expertise to arrive at decisions.

- in case of special investigations/decisions like reviews, reduction/suspension/withdrawal and other matters related to certification decision.

Quality Manager are responsible to independently evaluate (onsite/ offsite) the reputation, past history of adherence to legal and safety requirements, recent issues/ incidents, product recall/withdrawal issues and commitment of management towards using relevant sources.

5. Procedure of issue / grant of certificate

5.1 Criteria for grant of certificate

- COO shall be sole responsible for authorization for approving grant of certification, suspension, reduction/ extension and withdrawal of certificates based on the recommendations of the technical reviewer, auditor's recommendations and his own independent assessment.
  - Certificates may be granted to sites which have had an audit against per regulations (EU) 2018/848 and/or that meet(s) the following criteria as minimum-
  - The audited site has met the requirements of that standard within the scope of certification sought.
  - The site shall also have provided evidence of completion of critical non compliances , major non- conformities and a corrective action plan for the minors and these have been reviewed by Lead Auditor and have been further verified by technical reviewer.
  - The client has a farm and/or manufacturing facility and/or trading facility for primary production, and/or processing and/or sale of organic commodities. Additionally, the audited client (to whom certificate is to be issued) is mandatorily a legal entity or is legally responsible (for example, audited organization is legally incorporated company under companies act).
  - The client shall have completed at least one cycle of internal assessment to indicate the effective implementation of the system.
  - Scope/ activities of client are covered under accredited scope of MS Agroland Services Pvt Ltd
  - The assessment was conducted by qualified competent Auditors/ Technical Experts
  - The information provided by the Auditors is sufficient with respect to the certification requirements and the scope for certification.
  - Auditor has reviewed, accepted and verified the effectiveness of correction and corrective actions for all nonconformities that represent

- Failure to fulfill one or more requirements of the regulations (EU) 2018/848 or a situation that raises significant doubt about the ability of the client's system to achieve its intended outputs may lead to the non-certification of the client.

All completed documentation required for Certification shall be maintained. The implementation period of applicable Organic standard shall be as per the regulations (EU) 2018/848.

5.2 **Certification Decision**

Upon successful review of the audit pack and corrective evidences by Technical reviewer, Secondary Review Report – ASPL-CD-FR-27 (EU) , Technical Review and Certification Decision Report- ASPL-CD-ANX-37 along with following supporting documents are placed before certification committee for its review and decision.

1. Audit report;
2. Comments on the nonconformities and, where applicable, the correction and corrective actions taken by the client;
3. Confirmation of the information provided to the certification body used in the application review;
4. Confirmation that the audit objectives have been achieved;
5. Recommendation whether or not to grant certification, together with any conditions or observations. (Technical Review and certification decision report – ASPL-CD-ANX-37, Committee meeting – ASPL-CD-ANX-36). Certification Manager shall inform the operator about the decision and non-compliances closure reports in the prescribed formats after the certification committee decision. (Non compliances Closure Report – ASPL-CD-ANX-77, Certification Decision – ASPL-CD-ANX-78)
6. MS Agroland Services Pvt Ltd shall make decisions on renewing certification based on the results of the recertification audit, as well as the results of the review of the system over the period of certification and complaints received from users of certification.

If the certification body is not able to verify the implementation of corrections and corrective actions of any major nonconformity within 6 months after the last day of registration audit, the certification body shall conduct another registration audit prior to recommending certification. The audit documentation, documentary evidence supporting corrective actions, registration audit and annual audit report, confirmation of the information provided in the application review and auditor's report on corrective actions is assessed by the COO, and a decision will be made on

whether a certificate should be issued. COO shall take the minimum criteria documented in clause 6 of this procedure into account while granting/ declining of certificate. The decision of committee meeting regarding the grant or decline shall be recorded on the Certification Decision Report If the COO grants its decision for issuance of certificate, the decision along with Certification Decision Meeting record shall be passed to Administration for preparation of certificate.

Should certification not be granted outstanding issues will be identified and reported back to the site for further evidence to be provided that corrective actions have been completed and verified. Should the site not follow this up then the audit report will be issued and the status of **'Not Approved'** will be recorded.

5.3 Preparation/Drafting and Release of Certificate

The Administration /Operation team shall prepare the certificate and print the certificate. If required, the draft certificate shall be referred to COO or Quality Manager to avoid mistakes on the certificate. MSASPL shall provide a certificate to any operator or group of operators . The certificate shall:

- To be issued in electronic form in accordance with the ASPL-CD-ANX-38- EU Model certificate and by using the electric trade control and expert system (TRACES).
- Allow at least the identification of the operator or group of operators including the list of the members, the category of products covered by the certificate and its period of validity.
- The category of products covered by the certificate.
- Certificate period of validity;
- be updated whenever changes occur concerning the data included in it.
- Certify that the notified activity complies with this Regulation.
- Operators and groups of operators shall not place products on the market as organic products or in-conversion products unless they are already in possession of a certificate.

Certificates will be issued with an expiry date of one years in case of EU from the date of assessment and will be maintained provided the conditions of this procedure is kept being maintained. In case where COO is not physically available to sign on the certificate, a nominated authority (as authorized by COO) shall resume the authority of signing the printed certificates.

Invoiced certification charges shall have to be cleared by the audited organization before printed and signed certificate is updated on database and released to client organization representative. MS Agroland Services Pvt Ltd database shall be updated against the holder's

name with Certificate number, the date of issue, the scope and category of assessment. Following update of the MS Agroland Services Pvt Ltd database, the certificate (along with audit report) shall be forwarded to audited organization representative at contact address recorded in the file.

MS Agroland Services Pvt Ltd shall retain ownership of the certificate and in any eventuality of suspension, withdrawal and reduction in scope, the client shall have to mandatorily send back certificate (in original) to MS Agroland Services Pvt Ltd as per the policy and terms of contractual agreement.

5.4 Continuation or Maintaining Certificate

Certified clients shall be allowed to maintain certificate based on continued demonstration of effective management system in all respective assessments and in the events of changes/ modification or extension of scope.

5.5 Extension and Modification in Scope of Certificate

5.5.1 Extension or Modification in Scope of certificate on request

Certified clients, desirous of extension in scope of certificate on existing certificate, shall apply to MS Agroland Services Pvt Ltd Administrator/ Operation Team. Such application shall be then reviewed by COO members for merits in consultation with the audit team for the last assessment. Such reviews shall be undertaken to determine the condition (e.g. Documentary evidences, additional audit etc.) For extension of scope. If an additional audit is required it shall be carried as per procedure laid down in ASPL-CD-QM-01 (EU) to verify changes. This can also be done during the next planned surveillance audit.

Following the grant of extension in scope, Issued certificate (in original) shall be recalled back from the audited client and a revised certificate shall be issued in place in accordance to procedure documented in clause 6.1 and 6.2 of this procedure.

5.5.2 Modification in the Scope of Certificate due to change in management system Changes to management system shall be reviewed by COO which will further evaluate the need for reassessment of a certified client in the event of changes significantly affecting the organization's Management System (such as the legal, commercial, organizational status or ownership, organization and management (e.g. key managerial, decision-making or technical staff), contact address and sites, scope of operations (process change) under the certified management system and major changes to the management system and processes.

Following the grant of modification in scope, Issued certificate (in original) shall be recalled back from the audited client and a revised certificate shall be issued in place in accordance to procedure documented in clause 6.1 and 6.2 of this procedure.

5.5.3 Modification due to changes in Certification requirements/process

When the Accreditation Body revises the requirements of certification body, MS Agroland Services Pvt Ltd shall follow transition plan as notified by Accreditation Body for the changeover with agreed time frame.

Quality Manager shall send due notice of any changes it intends to make in its requirements for certification to its client and the accreditation body. The views expressed by interested parties are considered before deciding on the precise form and effective date of such changes. Based on the publication of the changed requirements, MS Agroland Services Pvt Ltd shall verify that each client carries out any necessary amendments to its procedure within reasonable time. Based on the changes expected Quality Manager shall decide the actions like a special audit as per documented procedure After successful completion of audit, decisions would be taken according to clause 6.1 and 6.2 of this procedure.

5.4 Issuance of Certificate in case of Recertification

Upon completion of recertification audit, technical review shall take place and process of 5certification shall take in this procedure. The certificate shall be issued on satisfactory completion of the process as outlined in Audit process and also additional fulfilling the conditions stated in MS Agroland Services Pvt Ltd Quality Manuals This recertification shall be for an additional three years. Original certification date shall remain same. Current certification date shall be on or after the date of recertification decision is taken. Certification expiry date will be one year after the date of recertification.

6. Procedure for Suspension, Withdrawal and Reduction in Scope of Certificate

6.1 Procedure for suspension of Certificate

MS Agroland Services Pvt Ltd shall suspend certification in cases where–

1. Clients certified Organic has persistently or seriously failed to meet certification requirements for effectiveness of the management system,

2. Certified client does not allow surveillance or recertification audits to be conducted within 3 months of due date,
3. In the events of complaints
4. Certified client voluntarily request for a suspension.
5. Non-payment issues
6. Misuse of Accreditation Body or MS Agroland Services Pvt Ltd 's certification Marks/logos.

Suspensions shall be authorized by COO and clients shall be notified in writing with reason and implication of suspension.

The standard period of suspension would be six months in which the client has to fulfill all conditions for revocation of suspension. On fulfillment of imposed conditions by the suspended sites within the six months timeline, the corrective action shall be reviewed by Quality Manager and pass his/her recommendation to revoke suspension or initiate withdrawal rules depending upon outcome of the review. In case of the failure on the part of the client to satisfy the conditions imposed for reinstatement of certification status, MS Agroland Services Pvt Ltd shall withdraw or reduce the scope of the certification based on the gravity of situation (refer to Procedure for Suspension and withdrawal further).

Under imposition of suspension-

1. Client's management shall be rendered temporarily invalid
2. In the period of suspension, client shall refrain from further promotion of its certification (as per terms and conditions of the contract agreement)
3. Suspended status of the client shall be made publicly accessible (e.g. updated on website etc.)

6.2 Procedure for Withdrawal of certificate

MS Agroland Services Pvt Ltd shall follow the documented procedure under 7.2 to effect the withdrawal process for certificate on following reasons–

1. Failure to resolve the issues (that have led to suspension of certification) in six months period,
2. Where entire management is impacted indirectly as result of the reduction in the scope.

The withdrawal of certificates may comprise of but may not be limited, to any of the following:

Routine circumstances:

Failure to maintain standards identified at the routine surveillance assessment and not corrected by submission of documentary evidence.

Failure to allow a scheduled surveillance visit to be undertaken

Voluntary withdrawal from the MS Agroland Services Pvt Ltd 's certification scheme.

Failure to pay the appropriate certification fees as agreed prior to undertaking the assessment.

Extraordinary circumstances

Complaints regarding the failure of the company to comply with the requirements of the relevant standard

Deliberate, misleading use of the Certificate

Deliberate or misleading claims relating to the scope, or level of Certificate held

The certified client requests a suspension of the certificate

Falsification of any nature

Failure to comply with terms of contractual agreement

COO shall have authority to authorize withdrawal of the certificate on the recommendation of Certification manager. The decision shall be taken based on investigation of Quality Manager, Certification manager and COO together. Quality manager shall authorize competent auditor/staff for investigative audit. Based on the outcome of such investigation, decision regarding the withdrawal may be initiated and client shall be notified of the withdrawal process. The client shall further be given specified time to take corrective action and certificate withdrawal process shall be initiated in the event of failure to respond with an acceptable programme for corrective action within the time period specified, or to consent to an assessment will lead to withdrawal of the certificate. In the event where certified site is already under suspension for the past six months, no further time shall be given further before initiation of withdrawal. Following withdrawal, the status shall be made public by updating the database. Issued certificate (in original) shall be recalled back and held in the file. The client shall right to appeal and shall be guided for filing appeal process upon request.

Where a client's certificate has been withdrawn and there has been no rectification of issues within the specified timescale or their certificate has expired, then the only way for a client to reinstate their certificate is by arranging a re-audit for the verification of rectification done by the client and annual audit.

6.3 Procedure for reduction in scope

Failure to resolve the issues (that have led to suspension of certification) in six months period shall result in reduction of scope of certification to exclude the parts not meeting the requirements. Such reductions shall be in line with the requirements of the standard used for

certification. In case where reduction in scope is likely impact the entire Organic, reduction shall not be permitted and in this eventuality withdrawal shall be initiated.

COO shall have authority to authorize reduction of the scope of the certificate on the recommendation of Quality Manager and certification manager.MS Agroland Services Pvt Ltd shall correctly update the reduction in scope status upon request to any party. The reduction in status of the client shall also be made publicly accessible.

7. **Transfer of Certification**

7.1 For transfer of certification from existing certification body to MS Agroland Services Pvt Ltd , the applicant organization shall be required to meet the following criteria-

I. Transfer of certification shall be permissible only for scopes for which MS Agroland Services Pvt Ltd hold Regulations (EU) 2018/848 within such scopes where MS Agroland Services Pvt Ltd is meeting competence criteria (Refer to point 7.1 of this section)

II. The applicant organization shall obtain NOC (No Objection Certificate) from existing certification body. NOC letter shall enable to provide MS Agroland Services Pvt Ltd to conclude that applicant organization have successfully closed all non-conformances (if open from previous audits) and has no pending financial dues.

III. Transfer of certificate shall be considered as the case where the existing certification body is holding accreditation to Regulations (EU) 2018/848 from IOAS or equivalent recognized accreditation bodies. Where the existing certification body of applicant organization fails to satisfy this criteria, application shall be treated as a new application and in such eventualities certification shall be considered from initial stage.

IV. All non-compliances from previous audit shall be successfully addressed and closed out.

V. Transfer of certification shall be considered only in the cases where certification at time of transfer application is valid (at least 30 days to expiry).

7.2 The procedure shall be operated in the following manner –

1. The application shall be laid for review by Quality Manager. The applicant shall be guided to complete application form and submit following documents (as minimum) – NOC from existing certification Body

A copy of existing certificate

Audit reports (from previous audits), corrective actions, corrective action evidences and other audit related documentation

Any other documentary evidences sought by reviewer

2. Received documentation together with application form (listed in sub-clause 1 above) shall be reviewed by Quality Manager and discuss with the applicant further to determine if any further documentary evidences are required for review decision.
3. Review decision shall be communicated to applicant with justification for acceptance or rejection/ modification within 7 days of submission of all required documentation. In case of acceptance with modification, the applicant organization shall be communicated on the further steps of certification (including the requirement for audit).

4. The applicant, in cases of acceptances, shall be provided with quote proposal and other onboarding documentation like signing of Agreement etc.

5. All post agreement steps shall proceed in the same manner as it takes places in case of non-transfer cases.

6. Data base of certificates issued, suspension, cancellation/ withdrawn, if any client/ operator changes the CB and if any, application from operator for which certificate was cancelled earlier and was listed on TRACES.

7. At any time clients may withdraw from MS ASPL certification through written notification. The client must cease to use all claims of the MS ASPL i.e. logo and name, destroy or return all certificates, labeling and marketing material containing reference of MS ASPL.

MS ASPL may also send the client a Withdrawal Letter, which notifies the client that client has voluntarily withdrawn from certification.

MS ASPL may also discontinue the certification of client due to a lack in the annual re-certification or lack of response within the designated renewal timeframe.

MS ASPL shall send the client a cancellation letter, which notifies the client that client has been discontinued from certification by MS ASPL due to lack in the annual re-certification or lack of response within the designated renewal timeframe.

E. Complaints and Appeals Process

1. Purpose

This procedure establishes the system for handling complaints and appeals associated with the MS Agroland Services Pvt. Ltd.

2. Scope

This procedure covers and is applicable to all personnel and offices of MS Agroland Services Pvt. Ltd.

Exclusion: This procedure shall not be used by employees or agents to complaint about other departments, personnel and internal services.

3. References

ASPL-CD-QM-01 Quality Manual

ASPL-CD-PR-09 Corrective and Preventive Action Procedure

4. Definition

Complaint: A formal expression of dissatisfaction about personnel, services, and/or clients of MS Agroland Services Pvt. Ltd. The notifications may take many forms e.g., verbal, letters or e-mails. This may be received from any stakeholder like Accreditation Body, Regulatory Body, User Company or any other body/ individual or as a feedback to survey.

Appeal: An appeal is a notification received by MS Agroland Services Pvt. Ltd. from a client or a user company, expressing a non-agreement with a decision made or provided by MS Agroland Services Pvt. Ltd.

User Company: A client organization of MS Agroland Services Pvt. Ltd.

5. Responsibilities

COO is overall responsible for the managing and monitoring of this procedure-

- Appointing the investigation officer for the received and registered complaints and appeals

- Passing needful instructions to sub-ordinates or Divisions on allocation of resources as required for completing investigation.
- Identifying and deciding course of actions (both corrective and preventive),
- Intimating the complainant/ appellant of its status and course of actions through Quality Manager
  if he/she is not involved,
- Final authority to determine the course of actions recommended by designated investigating officer

Quality Manager, deemed as coordinator, shall be responsible for-

- maintenance and regular updating of complaints and appeals
- coordination and firsthand contact for complaints and appeals
- monthly reporting of complaints and appeals summary to management.
- Coordination and maintaining communication with complainant/ appellant

Appeals Committee (as appointed by Technical Committee / COO in *para 7.2.3 of this procedure*) shall be responsible for second line resolution of appeals where appellant is not convinced of the outcome of appeal's review taken up in the first line resolution by COO.

Investigation officer (as designated) shall be responsible for:

- conducting investigation,
- root cause analysis,
- suggesting or recommending

Any person, who is part of the complaint/ appeal or its cause (i.e., in case of conflict of interest), shall not be allowed to participate in the complaint/ appeal handling process in any way. In case someone connected with the complaint or appeal is appointed due to lack of information, COO shall appoint another suitable person to replace the person involved.

6. Procedure of complaints

6.1. General

The complaint in general shall be classified and determined, before being entered into complaint and appeal registration form by Quality Manager, whether complaint relates to MS Agroland Services Pvt. Ltd. (including its employees) or is about its clients. The further course of investigation, validating information and corrective action shall depend on this classification which is outlined in subsections *6.2 and 6.3 of this procedure.*

MS Agroland Services Pvt. Ltd. shall keep the complainant updated throughout the process and MS Agroland Services Pvt. Ltd. shall further determine, in agreement with the client (or complainant), the extent to which the subject of complaint and/or resolution shall be made publicly accessible like publishing on websites, advertising in newspaper etc. keeping the confidentiality into consideration. However, this shall be available for reviews by Accreditation Board Audits and reviews for verification as and when demanded.

All the received complaints shall be analyzed during the Management Review to indicate the weaknesses and further shall form a part of corrective actions for process improvement.

In all cases, persons engaged in the complaint-handling process are different from those who carried out the audits and made the certification decisions. Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant.

6.2. Processing of complaints about Certification Division (AgroCert)

On receiving a complaint, the relevant details are recorded on a complaint form by Quality Manager within 1 day of receipt of complaint. The details of complaint are then apprised to COO who shall, determining the seriousness of the complaint, appoint or designate or assign an independent investigator (one who is not connected with content of complaint) within a timeline of another 3 days from

intimation by Quality Manager. COO shall decide on resource allocation for completing investigation into complaints and as such shall be responsible for directing or instructing all departments/personnel as required to complete investigation.

The investigation shall be used to establish a trail of events using following ways (not an exhaustive list) –

- Identify the cause of the problem and gather and verify all necessary information for verifying the chain of events
- Recording of statements of the MS Agroland Services Pvt. Ltd. employees (the subject of complaint)
- Recording of statements of complainants

Designated investigator shall investigate into complaint and find out the reasons and root-cause within minimum possible time. However, there shall not be any fixed deadline for completing investigation considering that a transparent and fair investigation may require detailed analysis of various issues. Upon completion of investigation, designated investigator shall submit a detailed investigation report along with recommendations (which can be in any format) to COO. COO shall have discretionary power to accept and implement recommendations in *toto* or in partial. However, there shall be a written justification for ignoring recommendations. Investigation report together with recommendations shall form the basis for course of redressal and future course of preventive actions.

Once agreement has been reached on satisfactory resolution of the complaint, the Quality Manager shall:

- Update the complaint form,
- Provide written confirmation of the action to complainant that will be or has been taken to resolve complainant's grievance.

Apart from confirming to the complainant what action has been taken to resolve their complaint, the complainant must be advised of their right to appeal against the handling of their complaint before Appeals panel. That is, if the complainant is not happy with the resolution of their grievance with MS Agroland Services Pvt. Ltd. they may lodge a written appeal with Appeals panel.

6.3. Processing of Complaints about Certification Division (AgroCert)'s Clients

On receiving a complaint, complaints can be received in writing only-either by letter, email or web portals etc. Upon receiving it is required to be recorded with unique number identification and an acknowledgement is required to be sent to the client. The complaint form (and other relevant details) is passed to COO. COO then reviews the significance of complaint and then assigns an investigation officer. Wherever, conditions permit, COO shall be investigation officer for complaints relating to violation of certification norms by any certified client. If a decision is taken to investigate a complaint; the method and resources allocated to the investigation is left to the discretion of COO. Progress of such investigations shall be reported as described above.

At the discretion of the COO, client which is the subject of a complaint, may be informed that MS Agroland Services Pvt. Ltd. is investigating a complaint made against it within 2-4 weeks of taking the decision for investigation based on the severity of the complaint. The client under the purview of complaint may also be informed of the outcome of the investigation. However, the content of disclosure shall be mandatorily be governed by the following terms:

- Degree and type of information given to a third-party is governed by MS Agroland Services Pvt. Ltd. Rules relating to confidentiality.
- Identity of the complainant shall not be disclosed without the complainant's expressed permission to do so.

If the complaint is solely about lack of service or a commercial dispute, the investigating officer shall organize a letter, over the signature of a Manager, outlining MS Agroland Services Pvt. Ltd.'s role to the complainant within seven (7) days from receiving the complaint. Once required action has been implemented, Quality Manager completes the entries and updates the Annex 11 Complaint and Appeal Handling Registration Form. If the complainant is not satisfied with complaint resolution, procedure allows complainant to further file appeal in accordance to appeals procedure outlined in *para 7*. In cases related to complaint against certified

client, continuity of the effectiveness of the implemented system for organic certification shall be verified by MS Agroland Services Pvt. Ltd.

6.4 Corrective and Preventive action

Where complaint pertain to certification activities of MS Agroland Services Pvt. Ltd. and further validated from investigations, corrective and preventive actions shall include-

- Counselling and training of the concerned employees or all,
- Provisioning of resources to bring improvement in transparency and compliance
- Other corrective/ preventive action as required depending upon the course of investigation

Where complaint pertain to certified clients regarding violation of certification norms and further validated from investigation, Corrective and preventive actions shall include-

- Suspension and withdrawal of certificate,
- Fines
- Other corrective/ preventive action as required depending upon course of the investigation

7 Procedure of Appeals

7.1 General

In the event that a complainant disagrees with a certification decision of MS Agroland Services Pvt. Ltd. or issues as referred in section 6 of this procedure, they are entitled to respond in writing giving reasons and appeal within 14 days of being officially informed of certification decision/ outcome of complaint investigation process. The client shall be guided by Quality Manager/ COO on the process of the appeals. In the first line response to appeal filed by complainant (referred as Appellant), COO shall first try to resolve the matter in the manner explained in para 7.2.1 of the appeals procedure.

Should the outcome of this first line resolution (or review) still be unacceptable to the client, appellant have recourse to the appeals panel process defined as second line resolution in paragraph 7.2.2. The procedure of appeals shall be made accessible to general public (either through public website or by making the hard printed copy of the procedure available on request) and if required Quality Manager shall further guide the appellant to file appeal by making available appeal application forms *Annex A11* **Complaints and Appeals Registration Form.**

In all cases, persons engaged in the appeals-handling process and decision-making process (taking the decision, review of the decision and approval of the decision) are different from those who carried out the audits and made the certification decisions.

Submission, investigation, and decision on appeals shall not result in any discriminatory actions against the appellant.

7.2 Procedure of Appeals

Appeals can be received in writing only-either by letter, email, or web portals etc. Upon receiving it is required to be recorded with unique number identification and an acknowledgement is required to be sent to the appellant by quality manager within one day of receipt of appeal on a appeal form. Further, a preliminary review is required to be conducted to confirm the validity of the appeal. Every appeal is required to be responded in writing to the appellant within seven working days after receipt of appeal. If investigation is expected to take more than two months, an interim progress report is required to be sent to the appellant. Action is required to decided based on the result/ outcome of investigation. While acting, it is required to consider the result of any previous similar appeals. Recurring issues or serious issues related to the system shall trigger the requirement for correction, root cause analysis and corrective action to prevent the recurrence as per the procedure of corrective and preventive action ASPL-CD-PR-09 and clause 7.2.6 and 6.4 of this procedure.

Following steps are taken for the resolution of the appeal:

7.2.1 First LineResolution

In the first line response to appeal filed by the complainant (hereafter referred as appellant), COO shall first try to resolve the issue by further investigation in the similar process as explained in section 6 of this procedure. The appellant shall be kept apprised of the ongoing appeals investigation taken up by MS Agroland Services Pvt. Ltd. The outcome of this investigation and final decision shall be informed to the appellant by COO in writing within 3 days of conclusion of investigation.

7.2.2 Second Line Resolution

Where appellant files for re-appeal, COO shall refer the matter to Appeals Committee in accordance to rules laid down in constitution of Appeals committee in 7.2.3 of this procedure. Representatives of MS Agroland Services Pvt. Ltd. and the appellant shall be entitled to be heard in confidence by the Appeal Committee Panel. The Appeal Committee Panel's decision, based on the majority of the Appeal Panel as declared by its Chairman, shall be final and will be communicated to the Appellant in writing within 7 days of the panel meeting and decision. The findings of Appeals Committee shall be binding on both MS Agroland Services Pvt. Ltd. and the appellant. Both Appellant and MS Agroland Services Pvt. Ltd. shall be required to take corrective action as outlined in para 7.2.6 of this appeals procedure. Resources for organizing meeting and appeals investigation shall be arranged by COO as explained in paragraph in 7.2.3 on Appeals Cost.

7.2.3 Appeals Committee Constitution

Chairperson of the Management Committee shall appoint a panel to hear the appeal. The panel referred as Appeals Committee shall comprise a Chairperson and two members, none of whom shall have any interest or direct association with the subject of the appeal or have been involved with the related audit or certification process. The Panel shall meet within 30 days of the receipt of the request for appeal. The appellant shall be given at least 14 clear days' notification of the constitution of the Appeal Panel, the time and place of the meeting.

The appellant has the right to state objections to the Appeal Committee Panel's constitution. Such objections shall be in writing and shall be communicated to the MS Agroland Services Pvt. Ltd. at least 7 clear days before the scheduled date for the Panel meeting. at its next scheduled meeting, or sooner if this would lead to a period of longer than 30 days between the appeal communication and the Panel's meeting, upon which the Board will decide whether or not to accept the appellant's objections and amend the constitution of the Panel accordingly. The appellant will be informed in writing of the Board's decision and of a new date for the hearing of the appeal in cases of such reconstitution.

7.2.4 Appeals Cost

MS Agroland Services Pvt. Ltd. India reserves the right to charge the Appellant, reasonable costs for this second line of independent appeals resolution through invoicing as defined in paragraphs 7.2.2. Levy of charges will be notified in advance at the time of second line resolution and may be charged to the appellant ahead of any review commencing. COO, in the meantime, shall arrange for resources necessary for constitution and meeting of the Appeals Committee which shall then be used for determining the charges to be invoiced.

7.2.5 Liabilities

Under no circumstances shall MS Agroland Services Pvt. Ltd. or its employees or agents be liable for any losses, damages, charges, costs or expenses of whatever nature which any approved producer, applicant or scheme member may suffer or incur by reasons of or arising from the administration or the performance of their respective obligations in connection with the Certification Scheme, except where costs arise as a result of the gross negligence or willful default of such persons.

7.2.6 Corrective Action

In cases where appeal outcome requires, COO shall authorize for suitable corrective action as per para 6.4 of this procedure depending upon nature of outcome of review by Appeals Committee.

7.2.7 MS Agroland Services Pvt. Ltd. shall communicate the next steps after receiving the decision of appeal committee to the certificate holder/ client. In case the certificate holder/ client is not satisfied with the MS ASPL appeal process, the certificate holder can submit a complaint against the MS ASPL to the CVB responsible for the oversight of the CB.

F. Policy of sanctions and disciplinary measures

1. Purposes

This policy establishes the steps that are required to be taken for protecting organic integrity.

2. Scope

This policy is applicable to all organic certifications.

3. Responsibility

Certification Manager, Quality Manager, and COO are responsible for executing this policy.

5. Policy

MSASPL has classified cases of non-compliance as minor, major or critical, on the basis of the classification criteria and then one or more of the following situations apply:

A- The case of non-compliance is minor when:

- The non-compliance does not affect the integrity of the organic or in-conversion product;
- The traceability system can locate the affected product(s) in the supply chain and the product can be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production; Examples of such minor noncompliance's include, but are not limited to, failure to submit information on time, improper document & record submission, etc. Minor issues, whether found in operational practices or recordkeeping, indicate no systemic failure in the design or implementation of the organic

management plan of all the scopes (crop production, group of operators , processing, trading, and wild collection) i.e they do not show an inability to comply with the Regulation (EU) 2018/848.. Certification can be granted or continued before correction, but correction must occur within the time period. MS ASPL grants certification which includes requirements for the correction of minor noncompliance within a specific time period as a condition of continued certification. Certification can be granted along with the notification to the operation, typically a "minor issue letter or along with the certification letter" describing the noncompliance. MS ASPL requires correction during a

The case of non-compliance is major when:

- The precautionary measures are not proportionate and appropriate and the controls that the operator has put in place are inefficient according to the assessment by the MSASPL
- The non-compliance affects the integrity of the organic or in-conversion product.
- The operator did not correct in a timely manner a minor non-compliance;
- The traceability can locate the affected product(s) in the supply chain and the product can be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production;

Noncompliance affects the integrity of the organic standard in general and the certification process in particular. Examples of such major noncompliances include, but are not limited to, noncompliance with organic standards, knowingly providing false information/ documents, misrepresentation as to the certification status, repetition of same nonconformities, and failure to rectify such non compliances, etc. In case of the raised of the warnning letter, suspension letter, withdrawn letter, termination letter and if any lot of product of infringement details shall communicate to the EU commission on immediate basis.

A- Major Noncompliance

S.NO	Noncompliance Type	Description	Action
1	Major	Refusal to notify MS ASPL of the changes which affect the operations organic status.	New conversion period required Limitation of certificate's scope

			Improvement of the implementation of the precautionary measures and the controls that the operator has put in place to ensure compliance 1st Incidence – warning letter and /or suspension of certificate minimum 15 days. 2nd incidence – 30 days minimum suspension 3rd incidence – Termination of a certificate.
2	Major	Provide false information to a certifying agent concerning changes to the operation which affect the operation's organic status, falsification of documentation, selling non- organic crops or products as organic	Termination or denial of certification or strict disciplinary action will be based on the severity of the incidence.
3	Major	In case the NC raised by the last inspector/ auditor is Major & no corrective action will be taken	Withdrawn and Denial of certification
4	Major	Application of prohibited materials, falsification of records concerning application of prohibited materials	Termination or denial of certification or disciplinary action will be based on the severity of incidence
5	Major	If product and label profiles are not completed, and ingredients details are	Product will not be listed in certificate or removed from certificate.

		not available on label and operator is supplying the product to EU.	

B- The case of non-compliance is critical when:

- The precautionary measures are not proportionate and appropriate and the controls that the operator has put in place are inefficient according to the assessment by the MSASPL
- The non-compliance affects the integrity of the organic or in-conversion product.
- The operator fails to correct previous major non-compliances or repeatedly fails to correct other categories of non-compliances;
- There is no information from the traceability system to locate the affected product(s) in the supply and the products cannot be prevented from being imported from a third country for the purpose of placing that product on the market within the Union with reference to organic production.

B- Critical Non complinces

S.NO	Noncompliance Type	Description	Action
1	Critical	If operator is wilfully/ purposefully violating the requirements of standards, or if they fail to correct existing major noncompliance issues	1st Incidence- Warning letter and/ or suspension of certificate minimum 15 days. 2nd incidence- 30 days minimum suspension 3rd incidence- Termination of certificate. Action shall be based on the severity of incidence. Special control measures/ restrictions will be issued for export of organic products.
1	Critical	If MS ASPL observes residue detection from laboratories, regular authorities, or any reliable sources	1st incidence- Warning letter and / or suspension of certificate minimum 15 days 2nd Incidence- 30 days minimum suspension 3rd Incidence- Termination of certificate. Action shall be based on the severity of incidence. Special control measures/ restrictions will be issued for export of organic products.

APPROVALS: Issue no: 02, Revised on dated 25.03.2024

AUTHOR	APPROVED BY
QUALITY MANAGER	COO

			Reduction of scope may be done.
1	Critical	Infringement that affects the organic integrity in the production.	1st Incidence- MS ASPL release the suspension letter to the operator and instruct them to remove indication of certification from the entire lot of the production cycle which is affected by the infringement concerned. 2nd incidence- Warning letter and / or suspension of certificate minimum 15 days. 3rd Incidence- 30 days minimum suspension 4th Incidence- Termination of certificate. Action shall be based on the severity of incidence. Special control measures/ restrictions will be issued for export of organic products.
1	Critical	If operator fails to submit certification fee in time.	Late fee will be charged. Certification may be denied or it can be suspended/ withdrawn.

Additional rules on actions to be taken in case of non-compliance

1. MSASPL suspects or receives substantiated information, including information from other control authorities or control bodies, that a product, which may not be in compliance with EU regulation, is intended to be imported from a third country for the purpose of placing that product on the market within the Union, but which bears terms referring to the organic production, or where such a MS ASPL has been informed by an operator of a suspicion of non-compliances.

(a) MSASPL shall immediately carry out an investigation with a view to verifying compliance with EU regulation

(b) Investigation shall be completed as soon as possible, within 15 days, and shall consider the durability of the product and the complexity of the case.

(c) MS ASPL shall prohibit the import from that third country for the purpose of placing the product concerned on the market within the Union as organic or in-conversion product pending the results of the investigation. Before taking such a provisional decision, MSASPL shall give the operator or group of operators an opportunity to comment.

(d) In the event that the results of the investigation, do not show any non- compliance affecting the integrity of organic or in-conversion products, those products shall be allowed to be used and labelled as organic or in-conversion products.

Additional rules on measures in the event of non-compliance

1. In the event of non-compliance affecting the integrity of organic or in-conversion products throughout any of the stages of production, preparation and distribution, for example as a result of the use of non-authorised products, substances or techniques, or commingling with non-organic products, the MS ASPL shall ensure, in addition to the measures to taken to organic production as set out in EU regulation, in the labelling and advertising of the entire lot or production run of the product intended to be imported from a third country for the purpose of placing that product on the market within the Union.

2. Where the non-compliance is established, the MS ASPL shall:

(a) Take any action necessary to determine the origin and extent of the non-compliance and to establish the responsibilities of the operator or group of operators.

(b) Take appropriate measures to ensure that the operator or group of operators remedies the non-compliance and prevents further occurrences of such non-compliance.

When deciding which measures to take, the MS ASPL shall take account of the nature of that non-compliance and the past record of the operator or of the group of operators with regard to compliance

3.MS ASPL shall take any measure it deems appropriate to ensure compliance with EU regulation and the delegated and implementing acts adopted pursuant that Regulation, including

(a) Applying the catalogue of measures referred to in EU Regulation.

(b) Ensuring that the operator or group of operators increases the frequency of own controls.

(C) Ensuring that certain activities of the operator or of the group of operators are subject to increased or systematic controls by the MS ASPL.

4.In the event of serious, or repetitive or continued non-compliance, the MS ASPL shall ensure that the operator or group of operators, in addition to the measures and prohibited from placing on the market within the Union for a given period products which refer to organic production, and that its certificate referred to in EU regulation be suspended or withdrawn, as appropriate.

5. The MS ASPL shall provide the operator or group of operators with a written notification of its decisions , together with the reasons for that decision.

Systems and procedures for the exchange of information

1. The MS ASPL shall use the Organic Farming Information System (OFIS) for the exchange of information with the Commission, with other control authorities and other control bodies, and with the competent authorities of the Member States and of the third countries concerned.

2.The MS ASPL shall take the appropriate measures and establish documented procedures to ensure timely exchanges of information with the Commission and with other control authorities and control bodies.

3.Where a document or procedure provided for requires the signature of an authorised person or the approval by a person at one or more of the stages of that procedure, the computer systems set up for the communication of those documents shall make it possible to identify each person and guarantee that the integrity of the content of the documents, including as regards the stages of the procedure, cannot be altered as per the EU regulation.

G. SANCTION CATALOGUE (EU)

S.NO.	Observations	Category Level (Major/ Minor)	SANCTIONS APPLICABLE

	Records are not kept up to date, even after a warning.	Major	Minimum suspension of 30 days Second Incidence: Certificate termination
	Lack of notification to ASPL of changes in the unit descriptions or of practical measures taken to assure the conformity of the products.	Minor	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
	Operator did not submit updated OMP to ASPL before inspection.	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Certification agreement termination
	For major NC, no corrective action is made by the operator	Major	First Incidence: withdrawal of Certificate Second Incidence: Suspension for 6 months
	Lack of information provided to the ASPL in terms of the application, including drift of a prohibited substances to field, production site, product, and the organic operations.	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
	Operator has a practice for the clearing the land by burning crop residue.	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
	Operators clear the primary forest for agriculture use.	Major	Refusal of certification for first certification Certification agreement termination
	Operator does not take the precautionary steps to reduce the risk of the contamination of the certified organic products by the prohibited products and cleaning measures in the storage.	Major	First Incidence: Issue a warning letter and/or certificate suspension, Second Incidence: Suspension for at least 15 days are required. Third Incidence: Certificate termination
	Operators use conventional seed and planting material treated with the prohibited substances.	Major	First Incidence: Extension of Conversion period by one year Second Incidence: withdrawal of Certificate Third Incidence: Suspension for 6 months
.	Operator us GM seed and planting material for cultivation	Major	First Incidence: withdrawal of Certificate Second Incidence: Suspension for 6 months Third Incidence: Termination of Certificate

APPROVALS: Issue no: 02, Revised on dated 25.03.2024

AUTHOR	APPROVED BY
QUALITY MANAGER	COO

.	Operators use factory farming manure for the soil fertility	Major	First Incidence: Extension of Conversion period by two year Second Incidence: Suspension for 6 months Third Incidence: Termination of Certificate
	Operators use organic or mineral fertilizers without respect of the requirements set in Annex 1, Chapter 3, Appendix 1 of EU	Major	First Incidence: Extension of Conversion period by two year Second Incidence: Suspension for 6 months Third Incidence: Termination of Certificate
	Operators use nonconformity fertilizers.	Major	First Incidence: Extension of Conversion period by two years Second Incidence: Suspension for 6 months Third Incidence: Termination of Certificate
.	Operators use human excreta applied in the field.	Major	First Incidence: Extension of Conversion period by two year Second Incidence: Suspension for 6 months Third Incidence: Termination of Certificate
.	Insufficient separation and or identification measures to ensure the separation of similar varieties cultivated in conversion and organic area.	Major	First Incidence: For a warning letter Second Incidence: Suspension for at least 15 days are required. Third Incidence: Certificate termination
.	If the data of the ingredients certifiers are unavailable, the product and label profiles are incomplete.	Major	The product won't be included in the certificate or added to it.
.	Negative comments about an operator that are consistently made by buyers, importing nations, certification organizations, and regulatory agencies	Major	First Incidence: Issue warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
.	Repeat residue detection from regulatory bodies, labs, or any other reliable resources	Major	First Incidence: Issue warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
.	Non-payment of prescribed fees	Major	Late fee will be charged. Certification withdrawal
.	The operator refuses the accreditation board -APEDA member and MS ASPL access to premises subject to controls, or to its book keepings, including	Critical	First Incidence ; Withdrawal of the certificate Second Incidence: Suspension of the certificate Third Incidence: Termination of the certificate

APPROVALS: Issue no: 02, Revised on dated 25.03.2024

AUTHOR	APPROVED BY
QUALITY MANAGER	COO

	financial records, or refuses to allow to take samples		
	If the operator is deliberately or willingly violating the standards	Critical	First Incidence ; Suspension of the certificate Second Incidence: Termination of the certificate
	Intentional mixing organic with in-conversion or non-organic products	Critical	First Incidence ; Suspension of the certificate Second Incidence: Termination of the certificate
	No or ineffective internal control system to ensure compliance of the entire with organic production rules	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
.	Sanction procedure is not implemented by the ICS	Major	First Incidence: Minimum suspension of 30 days Second Incidence: Certificate termination
.	The Internal inspectors do not visit every farm at least twice a year	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
.	Any major, critical non conformity observed as per EU standards not corrected by the operator in given deadline period	Major	First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. Second Incidence: Minimum suspension of 30 days Third Incidence: Certificate termination
.	If any Minor non conformity observed as per EU standards not corrected by the operator in given deadline period	Minor	The degree of occurrence will determine the course of action. Exports of organic products will be subject to extra regulations and limitations. It is possible to reduce the scope. Issue a warning letter
.	If any critical non conformity observed as per EU standards not corrected by the operator in given deadline period	Critical	First Incidence ; Suspension of the certificate Second Incidence: Termination of the certificate
.	The improper use of the logo by the operator to process or market non-inspected or unauthorized products.	Critical	First Incidence ; Suspension of the certificate

			Second Incidence: Termination of the certificate
.	Using a forged or expired certificate for any business transaction of organic product	Critical	First Incidence ; Suspension of the certificate Second Incidence: Termination of the certificate

Minor Non compliance: - Non compliance's that are correctable and do not compromise the integrity of the certification process.Certification may be given in addition to communication of the noncompliance to the operation, usually in the form of a "minor issue letter" or "along with certification letter." MS ASPL needs to be corrected within a certain time frame, which cannot be later than before the subsequent inspection or annual inspection. Written records of the issues found and solutions are maintained by MS ASPL.

Major noncompliance:- Discrepancies that compromise the integrity of the certification procedure in particular and the organic standard in general. Major noncompliance examples include, but are not restricted to, failure to comply with organic standards, intentionally supplying misleading information or documentation, misrepresenting one's certification status, repeating the same noncompliance, and failing to address such noncompliance.

Critical Noncompliances: These are the most serious of the three noncompliances. A significant violation could harm the consumer or the product, defeating the value of the organic standard altogether.

A register will be maintained for all sanctions which will include name and scope of sanctioned operator, date of certification, date of imposed, reasons and conditions, if any, for sanction.

H. PROCEDURE FOR GROWER GROUP CERTIFICATION PROCESS

1- Purpose: The purpose of this procedure of group of operators is to ensure to evaluate the effective implementation of the Regulations (EU) 2018/848.

2.Scope: To evaluate the effective implementation of the procedure of the group of operators.

3.Responsibility

Certification manager, Audit manager , Auditor & Technical reviewer.

APPROVALS: Issue no: 02, Revised on dated 25.03.2024

AUTHOR	APPROVED BY
QUALITY MANAGER	COO

4.Requirements

A member of a group of operators should register to only one group of operators for a given product.

Where the operator is engaged in different activities related to that product;

- The maximum size of a group of operators shall be 2,000 members.
- The individual certification cost represents more than 2 % of each member's turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25, 000 (value in approx. INR) or whose standard output of organic production is not more than EUR 15, 000 (value in approx. INR) per year.
- who have each holding of maximum:
  - ✓ five hectares
  - ✓ 0.5 hectares, in the case of greenhouses
  - ✓ 15 hectares, exclusively in the case of permanent grassland
- Group of operators composed of members whose production activities take place in geographical proximity to each other.
- Set up a joint marketing system for the products produced by the group.
- Establish a system for internal controls comprising a documented set of control activities and procedures in accordance with which an identified person or body is responsible for verifying compliance with Regulation (EU) 2018/848 of each member of the group.

  The group of operators should keep the following documents and records for the purposes of the system for internal controls (ICS)

  The list of members of the group of operators based on their registration of each member and consisting of the following elements for each member of the group of operators;

- Name and identification (code number)
- Contact details
- Date of registration
- Total land surface under the management of the member and whether it is part of an organic, in-conversion or non-organic production unit.
- Information on each production unit and/or activity: size, location, including a map where available, product, date of the beginning of the conversion period and yield estimates.
- Date of the last internal inspection with the name of the ICS inspector. Internal inspection shall be inspected by the internal inspector annually .
- Date of the last use of inputs.
- Date and version of the list of members of group of operators.

- The signed membership agreements between the member and the group of operators as legal person, which should include the rights and responsibilities of the member.
- The internal inspection reports signed by the ICS inspector and the inspected member of the group of operators and including at least the following elements.
  - (i) The name of the member and the location of the production unit or premises, including purchase and collection centres
  - (ii) The date and starting and ending hour of the internal inspection.
  - (iii) The findings of the inspection.
  - (iv) The audit scope/perimeter.
  - (v) The date of issue of the report.
  - (vi) The name of the internal inspector
- The training records of the ICS inspectors consisting of:
  - (i) The dates of the training.
  - (ii) The subject matter of the training.
  - (iii) The name of the trainer.
  - (iv) The signature of the trainee.
  - (v) Where appropriate, an assessment of the knowledge acquired i.e., training effectiveness evaluation.
  - (vi) The training records of the members of the group of operators.
- The records of the measures taken in case of non-compliance by the ICS manager, which include:
  - (i) The members subject to measures in case of non-compliance, including those suspended, withdrawn or required to comply with a new conversion period.
  - (ii) Documentation of identified non-compliance.
  - (iii) Documentation of follow-up of the measures.
- Traceability records, including information on the quantities, on the following activities, where relevant:
  - (i) Purchase and distribution of farm inputs including plant reproductive material by the group of operators.
  - (ii) Production including harvest, storing, preparation, delivery of products from each member to the joint marketing system, placing on the market of products by the group of operators

- The written agreements and contracts between the group of operators and subcontractors including information on the nature of the subcontracted activities.
- The appointment of the ICS manager.
- The appointment of the ICS inspectors as well as the list of ICS inspectors.
- MS ASPL Applicant and Operators shall follow the language of the Regulations of the European Union. EU regulation and supplementary acts available in 24 languages, including French, Spanish, English.
- Internal Organic Standard

✓ The internal organic standard shall be written by the ICS operator for the specific local situation of the organic project and shall summarise all applicable requirements of Regulation 848/2018 organic regulations

✓ It must be presented in an adequate language and form, according to the knowledge of ICS staff and farmers.

✓ Relevant if Grower group uses a language other than English: The internal standard's translated version in English will be made available for MS ASPL to verify.

- Registration of new farmers
  - ✓ ICS-farmer contract, is required to be signed by each farmer and the ICS operator.
  - ✓ The contract must be written in a language that the farmer understands. It is necessary to include contractual responsibilities adhere to the internal organic standard. The contract will also be offered in English as per the official communication language of MS ASPL.
  - ✓ Grower Group Sanction policy, Control measures-Process of registration of farmers, internal inspections, approval, disciplinary measures, The consequences of violation of the contract shall be in a language which is understood by the farmer and translated version of all this records in English shall be available for the verification of MS ASPL. must be clear (sanction policy).

MS ASPL auditor shall verify the group of operators as per the below;

A- MS ASPL auditor evaluating and verification of the functioning and maintaining of the ICS of a group of operators at least.

B- MS ASPL auditor shall verify and evaluate the documented procedures of the ICS in contrast of the requirements established in Regulation (EU) 2018/848.

C- MS ASPL auditor shall verify and evaluate the list of members of the group of operators with the required information for each member is continuously updated and aligned with the scope of the certificate.

D- MS ASPL auditor shall verify and evaluate the all members of the group of operators comply with the criteria set out in Article 36(1)(a), (b) and (e) of Regulation (EU) 2018/848 throughout their participation in the group of operators.

E - MS ASPL auditor shall verify and evaluate the training and competence of ICS inspectors and also proportionate and adequate ICS inspectors without conflicts of interest.

F- MSASPL auditor shall verify and evaluate the internal inspections of all members of the group of operators and their activities and production units or premises including purchase and collection centres which should carried out at least annually and documented.

G- MSASPL auditor shall verified and evaluate the new members or new production units and new activities of existing members, including new purchase and collection centres, accepted which should be approved by the ICS manager on the basis of the internal inspection report according to the ICS documented procedures that have been put in place.

H- MSASPL auditor shall verified and evaluate that the ICS manager takes appropriate measures in case of non-compliance, including their follow up, according to the ICS documented procedures that have been put in place and also any notification to the MSASPL.

I- MSASPL auditor shall verified and evaluate the internal traceability for all products and members of the group of operators is ensured by estimating quantities and by cross-checking the yields of each member of the group of operators.

J-MSASPL auditor shall verified and evaluate the maps or sketches with cardinal directions and geo-location of the production units and premises to be physically inspected, as provided by the groups of operators.

K- MSASPL auditor shall verified and evaluate the production units, equipment, means of transport, premises and other places under the control of the group of operators.

L- MSASPL auditor verified the traceability, labelling, presentation, advertising and relevant packaging materials by the following methods.

(i) Interviews with operators and staff.

(ii) sampling and laboratory analysis.

(iii) The examination of the control system that operators and groups of operators have put in place, including an evaluation of its effectiveness.

(iv) The examination of non-compliances found during previous inspections and the measures taken by the operators or by the groups of operators to address them.

(v) any other action required to identify cases of non-compliance.

M- MSASPL auditor shall check the traceability by appropriate documents including stock and financial records such as.

(i) The name and address of the supplier and, where different, of the owner or the seller, or the exporter of the products.

(ii) the name and address of the consignee and, where different, of the buyer or importer of the products.

(iii) The certificate of the supplier in accordance.

(iv) The appropriate lot identification

N- MSASPL auditor shall verify and evaluate the mass balance covers the following elements justified by appropriate documents including stock and financial records, where relevant:

(i) The nature and the quantities of products delivered to the unit and, where relevant, of materials bought and the use of such materials, and, where relevant, the composition of products.

(ii) The nature and the quantities of products held in storage at the premises including at the time of the physical on-the- spot inspection.

(iii) The nature and quantities of the products that have left the unit of the operators or groups of operators to the consignee's premises or storage facilities.

(iv) In case of operators or groups of buy or sell the product(s) without storing or physically handling the product(s), the nature and the quantities of products that have been bought and sold.

(v) The yield of the products obtained, collected or harvested over the previous year.

(vi) The estimated or actual yield of the products obtained, collected or harvested over the current year.

(vii) The number and/or weight of livestock managed over the current and previous year.

(viii) Any losses, increase or decrease in quantity of products at any stage of production, preparation and distribution.

(ix) The total output of the holding in terms of organic and non-organic products.

O- MSASPL do risk assessment to select the sample of the members of the group of operators.

(a) minimum 10 % of all official controls of operators or groups of operators shall be carried out without prior notice every year.

(b) minimum 5 % of the operators that are members of a group of operators, but not less than 10 members, shall be subject to re-inspection every year.

(c) Where the group of operators has 10 members or less, all members shall be controlled in connection with the verification of compliance referred to in Article 38(3) .

P- The MSASPL shall allocate reasonable time for the control of a group of operators, proportional to the type, structure, size, the products, the activities and output of organic production of the group of operators.

Q- MSASPL shall carry out witness audits in order to verify the competence and knowledge of ICS inspectors.

R- MSASPL assess whether there is a failure of the ICS based on the number of non-compliances undetected by the ICS inspectors and the result of the investigation of the cause and the nature of the non-compliances.

I. SANCTION CATALOGUEFOR GROUP MEMBER REGISTERED IN GROWER GROUP

1. Purposes

This policy establishes the steps that are required to be taken for protecting organic integrity.

2. Scope

This policy is applicable to the **GROUP MEMBER REGISTERED IN GROWER GROUP for organic certification requirement**.

3. Responsibility

Certification Manager, Quality Manager, and COO are responsible for executing this policy.

4. Policy

As stated in ASPL-CD-PR-39(EU)MSASPL has classified cases of non-compliance as minor, major or critical, on the basis of the classification criteria.

Minor Noncompliance: - Non-compliance's that are correctable and do not compromise the integrity of thecertification process. Certification may be given in addition to communication of the noncompliance to theoperation, usually in the form of a "minor issue letter" or "along with certification letter." MS ASPL needs to be corrected within a certain time frame, which cannot be later than before the subsequent inspection or annual inspection. Written records of the issues found and solutions are maintained by MS ASPL.

Major noncompliance: - Discrepancies that compromise the integrity of the certification procedure in particular and the organic standard in general. Major noncompliance examples include, but are not restricted to, failure to comply with organic standards, intentionally supplying misleading information or documentation,misrepresenting one's certification status, repeating the same noncompliance, and failing to address such noncompliance.

Critical Noncompliances: These are the most serious of the three noncompliances. A significant violation could harm the consumer or the product, defeating the value of the organic standard altogether.

A register will be maintained for all sanctions which will include name and scope of sanctioned farmer, date of

certification, date of imposed, reasons and conditions, if any, for sanction

SANCTION CATALOGUE

S.NO.	Observations	Category Level (Major/ Minor)	SANCTIONS APPLICABLE
	Farm Records are not kept up to date, even after a warning.	Major	1. Minimum suspension of 30 days 2. Second Incidence: Certificate termination

APPROVALS: Issue no: 02, Revised on dated 25.03.2024

AUTHOR	APPROVED BY
QUALITY MANAGER	COO

2.	For major NC, no corrective action is made by the operator	Major	1. First Incidence: withdrawal of Certificate 2. Second Incidence: Suspension for 6 months
3.	Farmer has a practice for the clearing the land by burning crop residue.	Major	1. First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. 2. Second Incidence: Minimum suspension of 30 days 3. Third Incidence: Certificate termination
4.	Farmer clear the primary forest for agriculture use.	Major	1. Refusal of certification for first certification 2. Certification agreement termination
5.	Farmer does not take the precautionary steps to reduce the risk of the contamination of the certified organic products by the prohibited products and cleaning measures in the storage.	Major	1. First Incidence: Issue a warning letter and/or certificate suspension, 2. Second Incidence: Suspension for at least 15 days are required. 3. Third Incidence: Certificate termination
6.	Farmer use conventional seed and planting material treated with the prohibited substances.	Major	1. First Incidence: Extension of Conversion period by one year 2. Second Incidence: withdrawal of Certificate 3. Third Incidence: Suspension for 6 months
7.	Farmer use GM seed and planting material for cultivation	Major	1. First Incidence: withdrawal of Certificate 2. Second Incidence: Suspension for 6 months 3. Third Incidence: Termination of Certificate
8.	Farmer use factory farming manure for the soil fertility	Major	1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months 3. Third Incidence: Termination of Certificate
9.	Farmer use organic or mineral fertilizers without respect of the requirements set in EU regulation	Major	1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months 3. Third Incidence: Termination of Certificate
10.	Farmer use nonconformity fertilizers.	Major	1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months 3. Third Incidence: Termination of Certificate
11.	Farmer use human excreta applied in the field.	Major	1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months 3. Third Incidence: Termination of Certificate
12.	Insufficient separation and or identification measures to ensure the	Major	1. First Incidence: For a warning letter

	separation of similar varieties cultivated in conversion and organic area.		2. Second Incidence: Suspension for at least 15 days are required. 3. Third Incidence: Certificate termination
13.	Repeat residue detection from regulatory bodies, labs, or any other reliable resources	Major	1. First Incidence: Issue warning letter and/or certificate suspension, at least 15 days are required. 2. Second Incidence: Minimum suspension of 30 days 3. Third Incidence: Certificate termination
14.	If the Farmer is deliberately or willingly violating the standards	Critical	1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate
15.	Intentional mixing organic with in-conversion or non-organic products	Critical	1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate
16.	Any major non conformity observed as per EU standards not corrected by the Farmer in given deadline period	Major	1. First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. 2. Second Incidence: Minimum suspension of 30 days 3. Third Incidence: Certificate termination
17.	If any Minor non conformity observed as per EU standards not corrected by the operator in given deadline period	Minor	The degree of occurrence will determine the course of action. 1. Exports of organic products will be subject to extra regulations and limitations. 2. It is possible to reduce the scope. 3. Issue a warning letter
18.	If any critical non conformity observed as per EU standards not corrected by the operator in given deadline period	Critical	1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate
19.	In the case of confirmed substantiated suspicion	Critical	1. First Incidence ; Blocking of product and downgrade of status 2. Second Incidence: Suspension of the certificate for six months 3. Third incidence: Termination of the certificate

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J. Risk Based inspection planning procedure.

Purpose: The additional and unannounced audit enables a review of the robustness of the management system related to farming (individual farmer/ organic grower group) / processing/ trading/ wild collection/ Off-farm input approval unit through periodic unannounced inspection of the process against requirements of the standard. This document sets out the protocol for conducting the risk assessment, identifying the operators for unannounced audits on the basis of risk, and covers planning, auditing, record completion, reporting, and follow-up. The system of unannounced audits is only applicable to certified operators. MSASPL Shall plan and conduct 10% unannounced inspection and 10% additional inspection of all their certified operators on the basis of risk assessment.

Scope: It is applicable for individual farmer, organic grower group, and processing, trading, wild collection, and off-farm input approval. Based on the risk assessment of operator MSASPL Shall plan and conduct 10% unannounced inspection and 10% additional inspection of all their certified operators on the basis of risk assessment.

Responsibility –Audit Manager and Certification Manager

For Detailed procedure ASPL-CD-PR-14 (EU) kindly email at info@agrolandgroup.com.

K. Procedure For Sampling, Sample Preparation and Retention

Purpose: The purpose of this technical procedure is to ensure that the samples of a nominated project / cargo are drawn with the correct sampling practice and techniques, the quality characteristics of these samples are representative of the whole consignment and the gross samples are appropriately prepared in order to obtain the measurement samples required for analysis and testing. Scope: To established effective sampling. Responsibility All MS ASPL inspectors involved in the process of sampling and sample preparation are responsible for performing in accordance with this procedure. The Quality Manager is responsible for verifying that the performance of the inspector team is always maintained in

line with this procedure. Revision of this procedure shall be the responsibility of the quality manager of MS ASPL. Requirements This procedure applies to all types of dry cargo (bulk, break-bulk or packaged). The sampling and sample preparation can be carried out at different stages: from field, from processing and storage or warehouse, pre-shipment etc. CODEX General Guidelines on Sampling –CAC/GL 50-2004

For Detailed procedure ASPL-CDPR-31(EU) kindly email at info@agrolandgroup.com.

L. Procedure for Exceptions and Derogations

Purpose- This procedure establishes the requirements of exceptions and derogations.

Scope1. Documentation and related forms for assessment of split and parallel production. 2. Checks to be carried out for the purpose of the retroactive recognition of a previous period. 3. Recognition of catastrophic circumstances. 4. Conditions for derogations. 5. Authorisations for the use of non-organic plant reproductive material 6. Granting specific authorisations for the use of products and substances in certain areas of third countries 7. Reporting on provisional authorisation for the use of non-organic agricultural ingredients for processed organic food Responsibility: COO, Certification Manager, Quality Manager

For Detailed procedure ASPL-CD-PR-40 (EU)kindly email at info@agrolandgroup.com

M. Procedure for investigation and complaint

1. Purpose: This procedure establishes the system for handling complaints and investigation associated with the MS Agroland Services Pvt. Ltd. 2. Scope: This procedure covers the requirements as per Regulations (EU) 2018/848.

3. Responsibility: COO, Quality Manager and Business Development Executive

For Detailed procedure ASPL-CD-PR-43 (EU)) kindly email at info@agrolandgroup.com

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