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 Audit Manager are responsible for executing this policy.

**5. Policy**

MS Agroland Services Private Limited (MS ASPL) categorizes noncompliance as major and minor based on the severity.

MS ASPL develops the sanction catalog as per the scope i.e –Crop Prodcution , Grower Group, Processing , Packaging and labelling, Wild collection and Livestock Feed and their consequences. Major and Minor noncompliance can be described as following

1. **Minor Noncompliance –** Noncompliances that do not affect the integrity of the certification process and are rectifiable Examples of such minor noncompliances 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, organic grower group, processing, trading, and wild collection) i.e they do not show an inability to comply with the COR organic standards. 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 noncompliances 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 specific period that can be no later than prior to the next inspection or annual update. MS ASPL keeps written records of the issues identified and their corrections.

1. **Major Noncompliance –** 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 In case of the issuance of warnning letter, suspension letetr, withdrawn letter, termination letter and if any irregualrities found in any lot ,MSASPL shall communicate the infrigments to the CFIA on imediate basis.

In case of serious infringement of the COR standard is noticed by MSASPL. MSASPL in such cases will take the deciplinary action by removing the entire lot from trade.

|  |  |  |  |
| --- | --- | --- | --- |
| **S.NO.** | **Observations** | **Category Level (Major/ Minor)** | **SANCTIONS APPLICABLE** |
|  | Records are not kept up to date, even after a warning. | Major | 1. Minimum suspension of 30 days 2. Second Incidence: Certificate termination |
|  | Lack of notification to MSASPL of changes in the unit descriptions or of practical measures taken to assure the conformity of the products. | Minor | 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 |
|  | Operator did not submit updated OMP to MSASPL before inspection. | Major | 1. First Incidence: Issue a warning letter and/or certificate suspension, at least 15 days are required. 2. Certification agreement termination |
|  | 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 |
|  | 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 | 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 |
|  | Operator 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 |
|  | Operators clear the primary forest for agriculture use. | Major | 1. Refusal of certification for first certification 2. 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 | 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 |
|  | Operators 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 |
|  | Operator us GM seed and planting material for cultivation | Major | 1. First Incidence: withdrawal of Certificate 2. Second Incidence: Suspension for 6 months |
|  | Operators 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 |
|  | Operators use organic or mineral fertilizers without respect of the requirements of COR. | Major | 1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months |
|  | Operators use nonconformity fertilizers. | Major | 1. First Incidence: Extension of Conversion period by two year 2. Second Incidence: Suspension for 6 months |
|  | Operators 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 |
|  | Insufficient separation and or identification measures to ensure the separation of similar varieties cultivated in conversion and organic area. | Major | 1. First Incidence: For a warning letter 2. Second Incidence: Suspension for at least 15 days are required. 3. 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 | 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 |
|  | 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 |
|  | Non-payment of prescribed fees | Major | Late fee will be charged. Certification withdrawal |
|  | The operator refuses the accreditation board – IOAS and CFIA member and MS ASPL access to premises subject to controls, or to its book keepings, including financial records, or refuses to allow to take samples | Critical | 1. First Incidence ; Withdrawal of the certificate 2. Second Incidence: Suspension of the certificate 3. Third Incidence: Termination of the certificate |
|  | If the operator is deliberately or willingly violating the standards | Critical | 1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate |
|  | 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 |
|  | No or ineffective internal control system to ensure compliance of the entire with organic production rules | 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 |
|  | Sanction procedure is not implemented by the ICS | Major | 1. First Incidence: Minimum suspension of 30 days 2. Second Incidence: Certificate termination |
|  | The Internal inspectors do not visit every farm at least twice a year | 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 |
|  | Any major, critical non conformity observed as per COR standards not corrected by the operator 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 |
|  | If any Minor non conformity observed as per COR 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 |
|  | If any critical non conformity observed as per COR 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 |
|  | The improper use of the logo by the operator to process or market non-inspected or unauthorized products. | Critical | 1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate |
|  | Using a forged or expired certificate for any business transaction of organic product | Critical | 1. First Incidence ; Suspension of the certificate 2. Second Incidence: Termination of the certificate |

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.