

## Sanction Catalogue

### (In continuation to the operating policy of USOCA:

USOCA, categorized Non-Compliance as major, minor and irregularity (sanction) based on the severity and their consequences major, minor and sanction can be disabled as following: -

- Minor Non-Compliance: Offences that do not affect the integrity of the accreditation process and are rectifiable. Examples of such minor offences include but are not limited to failure; to submit information on time, improper document control, internal audit and management review not carried out as per requirement.
- Minor issues in operation i.e. record keeping, indicate no system failure or implementation of the organic system plan. Certification can be granted or continued before correction, but correction must occur during a specified period that can be no later than prior to the next inspection or annual update or as per USOCA Policy the minor NC will be upgraded to Major NC if not rectified before next inspection.

Major Non-Compliance: Offences that affects the integrity of the NPOP in general and Certification process in particular. Examples of such major non-compliances include, but are not limited to Non-compliance with organic standard, knowingly provide false information/documents misrepresentation as to certification status, repetition of same non conformities, failure to rectify such non compliances etc.

Irregularity/sanction can be imposed in case, when the non-compliance affects the integrity of organic and in conversion and operators failed to take proper corrective measures and to control the damage as per USOCA inspection audit report than USOCA will impose sanctions on the operator based on non-conformity during inspections/investigations etc. as per their sanction catalogue.

The sanctions to be imposed shall be depend on the nature, degree and extent of such nonconformity.



# **A- CROP PRODUCTION:**

S. No.	Description	Non-Compliance Type	Action
1	Applicant for certification is not able to comply or not in compliance with the requirements of standard	Major	Denial of certification
2	Where an applicant seeking registration, fails to submit information and/ or documents within the prescribed time period.	Major	Query letter shall be issued to the operator with a fifteen days' time limit for submitting response  If operator fails to reply. Rejection of Application.  Operator has to re-apply the application if he wishes with complete information along with supporting documents
3	Deviation from the system plan in which Practices and/or procedures described in system/management plan are not followed System Plan.  The ICS does not follow the procedures in the approved organic system plan.	Major	Communication to operator for justification.  Suspension of group till satisfactory evidence provided by operator.  If satisfactory reply and action not received from operator then withdrawn of certificate/termination of the project.
4	False information and/ or documents have been provided by an applicant seeking registration.	Major	The application for registration shall be rejected.
5	Operator does not notify to USOCA for the changes which effect the operational organic status	Major	For first time, Warning letter to be issued to operator.  During Second time, depending upon the severity of incidence project shall be suspension till rectification or Termination or Withdrawal of certificate.
6	Provide false information/ documents to USOCA, or misrepresentation of organic status	Major	Depending upon the severity of incidence Project shall be suspended along with deemed fit action as following  Downgrade the status of the project.  No stock shall not be updated.  No transaction certificates shall be issued for crops in question.  No. of unannounced and additional inspection shall be increased.  Repetition of the non compliance shall lead to Denial of Certification/termination of the Project.
7	Repetition of Minor NC	Major	NC shall be upgraded as Major

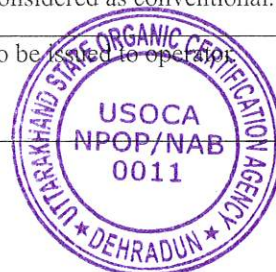


8	False records submitted by operators regarding application of prohibited input.	Major	Depending upon the severity of incidence Project shall be suspended till rectification.  If not corrected on time; Denial of Certification/Termination of project
9	Use of prohibited inputs by the farmer(s) of the group	Major	As per the severity of the incidence disciplinary action (sanction, suspension or termination) will be imposed.  If the inspected farmers are less than 25% of risk assessed farmers then the following sanction shall be imposed.  Mentioned farmers shall be expelled from the group.  No stock shall be updated for the group.  No transaction certificates for the mentioned season.  No. of unannounced and additional inspection shall be increased.  If inspected farmers are more than 25% then the project is liable for rejection/termination.
10	Use of off farm seed without any source conformity or without approval of USOCA.	Major	Warning letter to be issued  If the inspected farmers are less than 25% of risk assessed farmers then farmer using off farm Seed will be expelled from the group.  If inspected farmers are more than 25% then downgrade the status of the project.  No transaction certificates for the mentioned season.  No. of unannounced and additional inspection shall be increased.
11	Use of own farm seed /planting material but cannot be verified as organic	Major	In first phase the production of that crop shall be rejected and if repeated then the suspension shall be done and no transactions for all the crops having such issues shall be initiated for that cropping season.
12	Lack of adequate buffer zone between conventional and organic Land or Lack of sufficient protections against contamination from adjoining land/plots.  Drift of prohibited pesticides from adjacent plots / land.  Drift of prohibited pesticides from own conventional plots	Major	Communication to operator for justification.  Suspension of group till satisfactory evidence provided by operator.  No stock verified and No Transaction given  If satisfactory reply and action not received from operator then withdrawn of certificate/termination of the project.  Additional / unannounced inspections shall be more frequent
13	Production of the same or similar organic and conventional crops without	Major	Depending upon the severity of non-compliance following action shall be done





	possibility of separation during production		No transaction for the questioned crops or for the whole group.  Repetition of the NC shall lead to suspension or withdrawn of certification.
14	Slight or serious deviation from the rule of crop rotation.	Minor	Time line allowed to operator for correction along with verification.  If not rectified upgraded to major.
15	No records exist to support standards compliance to insect, pest, weed and disease management.	Major	Communication to operator for justification.  Suspension of group till satisfactory evidence provided by operator.  If satisfactory reply and action not received from operator then withdrawn of certificate/termination of the project.
16	Presence of empty plastic pouches of insecticide/ Nematicide in the registered organic plots.	Major	Time given for correction  Suspension may be initiated if condition still persists.  Verification audit during suspension shall be conducted and if the clear evidences of conformity are not established then denial of certification/termination shall be initiated.  Additional and unannounced inspections shall be more frequent for such cases.
17	Contamination through human excreta, sewage in the plot registered for organic production and certification.	Major	In case if the number of farmers inspected for whom there is a proof of Contamination through human excreta, sewage in the plot registered for organic production and certification are less than 25%, then produce of such farmers shall be treated as conventional and no TC shall be issued.  In case if for the number of farmers inspected for whom there is a proof of Contamination through human excreta, sewage in the plot registered for organic production and certification, are more than 25% then the group is suspended till rectification  Additional and unannounced inspections shall be more frequent for such cases.  If the condition still persists then scope shall be terminated.
18	History of chemical use on land	Major	Denial of certification
19	Use of GMO or chemically treated seeds	Major	Reduction of scope in conversion 1 <sup>st</sup> year  Stock shall be considered as conventional.
20	Use of allowed off farm inputs (plant propagation material, soil inputs, products	Minor	Warning letter to be issued to operator



	for plant pest/disease control) without prior approval		Repetition of NC shall lead to suspension of the project up to rectification.
21	Inadequate fertility management	Minor	Warning letter to be issued to operator along with a time limit allowed for corrective measures.  Additional/unannounced inspection to verify the condition.  If not corrected the project shall be liable for suspension till corrective action.
22	Low proportion of legumes (below 15 %), in production, if nitrogen is not even compensated with green manure or organic manures	Major	Warning shall be issued to the operator.  Repetition of the NC in subsequent years shall result in rejection of the yield of crops for the whole group.  Additional and unannounced inspections shall be more frequent for such cases.  Repetition shall result in downgrading the status of the scope as per severity of the situation.
23	Inadequate measures to conserve soil and water	Minor	A time limit allowed for corrective measures. If repeated NC shall be upgraded to Major.
24	In the case of NOC transfer During verification audit; if Operator / representative sample of farmers—from Grower Group reveals failure to comply with the certification standards applicable to operator/Grower Groups.	Major	NOC will be rejected or Operator shall be Termination.
25	During registration through NOC operator fail to disclose previous history / information to USOCA	Major	If the information is related to stock details. No stock shall be updated and all the previous stock shall be considered as nil.  If the information is related to previous history regarding detection of any residue or complaints / status of the scope shall be downgraded.  No transaction for the whole group.
26	In the case of a Grower Group, if the inspection of a representative sample of farmers reveals that the Internal Control System (ICS) has failed to comply with the certification standards applicable to Grower Groups, sanctions should be applied to the entire group or ineffective ICS.	Major	Depending upon the severity of the incidence:  No transaction certificates issued for current season crop or operator not allowed for transaction of any produce for complete cycle of seasons  Suspension of entire group till rectification.  Additional/unannounced inspection shall be more frequent.  If repeated; Termination / Withdrawal of certificate.





27	As per the standard and organizational structure required staffs are not found to verify them.	Major	<p>Letter to the operator to give justification</p> <p>Suspension of group till satisfactory evidence provided by operator.</p> <p>If satisfactory reply and action shall not be done by the operator then withdrawn of certificate/termination of the project shall be imposed on the basis of severity of incidence</p>
28	Functional office of operator is not found in actual location of the operation.	Major	<p>Warning letter to the operator along with physical verification audit or Suspension of group till satisfactory evidence provided by operator regarding correct/actual location of the operation.</p> <p>If satisfactory reply and action not received from operator then withdrawn of certificate/termination of the project.</p>
29	False information provided by the ICS regarding actual farmer list (Migrated or not interested farmers)	Major	<p>Warning letter to be issued</p> <p>If the inspected farmers are less than 25% of the risk assessed farmers then migrated and not interested farmers shall be expelled from the group.</p> <p>If inspected farmers are more than 25% of the risk assessed farmers then downgrade the status of the project.</p> <p>No transaction certificates for the ICS.</p> <p>No. of unannounced and additional inspection shall be increased.</p>
30	Violation of term and condition mentioned in USOCA-operator certification services agreement	Major	<p>Warning letter to the operator to verify the details at their end along with holding transactions till satisfactory reply.</p> <p>Suspension of project till satisfactory response/evidence provided by operator.</p> <p>If satisfactory reply and action will not be done by the operator then withdrawn of certificate/termination of the project shall be imposed.</p>
31	Errors in the documentation	Minor	<p>Time line allowed to operator for correction along with verification.</p> <p>If not rectified NC upgraded to major.</p>
32	During harvesting, handling, and storage, there is no obvious division between parallel production since there is insufficient demarcation, the crops are not recognisable, and production estimations are incorrect.	Major	<p>If corrective measures are not feasible, certification might be refused.</p> <p>If corrective measures are feasible warning letter to be issued along with time limit for corrective action.</p> <p>If corrective action not taken &amp; depending upon the severity of the incidence :</p> <p>Downgrade the status of the project.</p> <p>Total stock will be considered as null.</p>



			<p>No transaction certificates for the crops in question.</p> <p>Repetition of the NC leads to suspension / withdrawn of certification.</p>
33	Lack of ICS implementation policies and processes	Major	<p>A time limit allowed for corrective measures, if operator fails to take adequate corrective action suspension shall be imposed till rectification.</p> <p>Additional/unannounced inspection shall be more frequent to verify the condition.</p> <p>If not rectified project liable for suspension or termination.</p>
34	100% of the members of the group are not audited by internal inspectors, there is no clear evidence of system of internal control functioning and there is no clear evidence that each farmer will be checked during the production season (a clear plan of internal control is not established)	Major	<p>Time given for correction along with warning letter.</p> <p>Additional and unannounced inspections shall be more frequent for such cases.</p> <p>Suspension may be initiated if condition still persists.</p> <p>Verification audit during suspension shall be conducted and if the clear evidences of conformity are not established then denial of certification/termination shall be initiated.</p>
35	Inadequate ICS personnel to manage the ICS	Major	<p>Time given for correction</p> <p>Additional and unannounced inspections shall be more frequent for such cases.</p> <p>Suspension may be initiated if condition still persists.</p> <p>Verification audit during suspension shall be conducted and if the clear evidences of conformity are not established then denial of certification/termination shall be initiated.</p>
36	If conflict of interest for staff not available.	Minor	<p>A time limit allowed for corrective measures, if operator fails to take adequate corrective action NC shall be upgraded to major.</p>
37	The absence of internal standards	Major	<p>A time limit allowed for corrective measures, if operator fails to take adequate corrective action; suspension</p>
38	Documents required by the NPOP are not being provided /available with farmers.	Minor	<p>A time limit allowed for corrective action along with verification documents provided to USOCA.</p> <p>If not provided NC shall be upgraded to major.</p>
39	ICS's inadequate risk assessment and management	Major	<p>A time limit allowed for corrective action along with verification documents provided to USOCA.</p> <p>If not provided liable for suspension till rectification.</p>



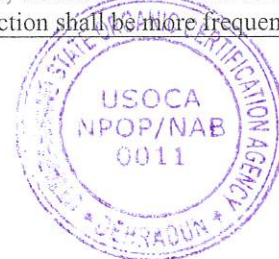


40	If Estimation of yield is incorrect.	Major	No issuance of TC for the crops in question.
41	Inadequate or no training for ICS personnel	Minor	A time limit allowed for corrective action along with verification documents provided to USOCA. If not provided NC shall be upgraded to major.
42	ICS personnel's lack of knowledge	Major	A time limit allowed for corrective action along with verification documents provided to USOCA. If not provided liable for suspension till rectification.
43	Farmers receive either no or insufficient training.	Minor	A time limit allowed for corrective action along with verification documents provided to USOCA. If not provided NC shall be upgraded to major.
44	Approval and sanction procedure not followed	Major	Warning letter to be issued along with time limit with adequate corrective action to be submitted to USOCA. If not provided liable for suspension till rectification.
45	Lack of traceability in purchase of crops from ICS.	Major	No issuance of TC for the crops in question.
46	Organic and non-organic products are commonly stored together.	Major	If corrective measures are not feasible, certification might be refused. If corrective measures are feasible; Warning letter to be issued along with time limit for corrective action. If corrective action not taken, depending upon the severity of the incidence : Total stock shall be considered as nil. No transaction certificates for the questioned crops. Additional/unannounced inspection shall be more frequent Repetition of the same leads to suspension / withdrawn of certification.
47	There was no corrective action taken for a major non-conformity.	Major	Termination of certification along with notification to APEDA.
48	Non-confirmation of renewal inspection	Major	Temporary suspension before expiry of grace period. If no response termination of certification.
49	Incorrect data or documents submitted in order to issue the transaction certificate	Major	No transaction shall be issued.
50	Scope certificate and transaction certificate fabrication	Major	Withdrawal of certification. The information about withdrawal of certificate is passed to APEDA





51	Rented or own warehouse are not informed before storage of organic products	Major	Time given for correction and if not done Suspension till rectification  Additional/unannounced Inspections may be planned to verify the situation.  Further continuation will result in suspension/termination.
52	In case of renting the warehouse, there is no rental agreement	Minor	Time given for correction and if not done  NC shall be upgraded to Major if condition persists suspension till rectification.
53	Stored goods are packed but not marked. Separate part for Organic Product (OP) in warehouse.	Minor	Time given for correction and if not done  NC shall be upgraded to Major if condition still persists suspension till rectification.
54	Stored goods are packed but not marked. There is no separate part for Organic Product (OP) in warehouse	Major	Time given for correction and if not done  No TC shall be issued for all products in question till corrective action is taken.  Additional/unannounced Inspections may be planned to verify the situation.  Further continuation will result in suspension/termination.
55	Receive any complaint for the first time	Major	Warning letter to be issued to operator to verify the complaint along with verification audit to be conducted by USOCA against the complaint or disciplinary action based on the severity of incidence. Control measures will be issued.
56	Receive repetitive complaints from buyer, certification bodies, APEDA or any other regulatory authorities.	Major	Warning letter to be issued to operator to verify the complaint along with verification audit to be conducted by USOCA against the complaint or disciplinary action based on the severity of incidence. If any positive sign received related to the complaint action based as severity of incidence or withdrawn of Certification/suspension of the project. Downgrade the status of the scope No transaction certificates for the crop/products in question or Operator not allowed for transaction of any produce for complete cycle of season
57	Residue detection from laboratories, authorities in Samples/Products.	Major	For first time; warning letter to the operator followed by Rejection of lot No transaction certificates for the crop/products.  During second time; Suspension depending upon severity of incidence till rectification.  During Third time; Termination/Withdrawn of Certificate  Control measures, visit of unannounced and Additional Inspection shall be more frequent.



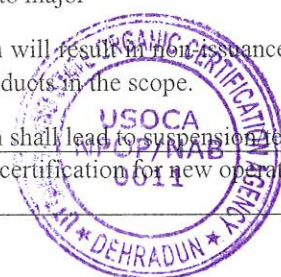
58	ETO detection from laboratories, regulatory authorities in the samples/Products	Major	<p>For first time; warning letter to the operator followed by Rejection of lot No transaction certificates for the crop/products.</p> <p>During second time; Suspension depending upon severity till rectification.</p> <p>During Third time; Termination/Withdrawn of Certificate</p> <p>Control measures, visit of unannounced and Additional Inspection shall be more frequent.</p>
59	GMO detection from laboratories, in the samples/Products	Major	<p>For first time; warning letter to the operator followed by Rejection of lot No transaction certificates for the crop/products.</p> <p>During second time; Suspension depending upon severity till rectification.</p> <p>During Third time; Termination/Withdrawn of Certificate</p> <p>Control measures, visit of unannounced and Additional Inspection shall be more frequent.</p>
60	If 50% risk assessed inspected farmers comes under major non compliance	Major	Whole group shall be terminated

#### B- PROCESSING, HANDLING AND TRADING OPERATION:

S. No.	Description	Non-Compliance Type	Action
1	Traceability regarding incoming raw material and finished product is not maintained and not documented adequately in the processing unit and batch/lot number adopted cannot be traced back to the origin	Major	<p>If corrective measures are not feasible, certification might be refused for the new operator</p> <p>For renewal: Time given for correction.</p> <p>Suspension shall be initiated till rectification</p> <p>No transaction shall be issued</p> <p>Additional and unannounced inspections shall be more frequent for such cases.</p> <p>Verification audit during suspension shall be conducted and if the clear evidences of conformity are not established then denial of certification/termination shall be initiated.</p>
2	Structural insect/pest management system has not been adequately adopted in the processing unit.	Major	<p>If corrective measures are not feasible, certification might be refused for the new operator</p> <p>For renewal: Time given for correction</p>



			<p>Suspension shall be initiated till rectification</p> <p>No transaction shall be issued</p> <p>Additional and unannounced inspections shall be more frequent for such cases.</p> <p>Verification audit during suspension shall be conducted and if the clear evidences of conformity are not established then denial of certification/termination shall be initiated.</p>
3	Training records for the workers engaged in the processing of organic products were not maintained adequately.	Minor	<p>Time for correction</p> <p>If not, NC upgraded to major</p>
4	Processing records, incoming records and outgoing records, stock records have not been updated.	Minor	<p>Time for correction</p> <p>If not, NC upgraded to major</p>
5	No proof available for the Food Grade category of the packing material used.	Major	<p>If corrective measures are not feasible, certification might be refused for the new operator</p> <p>For renewal: Time given for correction.</p> <p>Suspension shall be initiated till rectification</p> <p>No transaction shall be issued</p> <p>Additional and unannounced inspections shall be</p>
6	Ingredients in processing not identifiable as organic	Major	<p>No stock updated as organic.</p> <p>Repetition will result in suspension of scope.</p>
7	Cleaning before organic processing, when there's a time gap between them, cannot be verified.	Major	<p>Time given for correction and if not done rejection of the lot of Processed products in question and no TC shall be issued</p> <p>Additional Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
8	In case of Parallel Production, the Producer handles both organic and conventional products in the same processing unit without proper separation.	Major	<p>Warning shall be issued to the operator and subsequently no TC shall be issued for all the products in question.</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
9	No Organic Critical Control Plan developed or implemented	Minor	<p>Time given for correction and if not NC will be upgraded to major</p> <p>Repetition will result in non-issuance of TC for all the products in the scope.</p> <p>Repetition shall lead to suspension/termination.</p>
10	Use of prohibited ingredients or the use of the same ingredient from organic and	Major	<p>Denial of certification for new operator</p>





	conventional sources in the same product		<p>If already certified, then suspension shall be initiated.</p> <p>No issuance of TC. All the stock will be deleted from trace net</p>
11	Incorrect data or documents submitted in order to issue the transaction certificate	Major	<p>TC not issued along with warning shall be issued to the operator</p> <p>If repeated, Suspension till rectification.</p> <p>Repetition shall lead to suspension/termination.</p>
12	Rented or own warehouse are not informed before storage of organic products	Major	<p>Time given for correction and if not done Suspension till rectification</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
13	In case of renting the warehouse, there is no rental agreement	Minor	<p>Time given for correction and if not done</p> <p>NC shall be upgraded to Major if condition persists suspension till rectification.</p>
14	Stored goods are packed but not marked. Separate part for Organic Product (OP) in warehouse.	Minor	<p>Time given for correction and if not done</p> <p>NC shall be upgraded to Major if condition persists suspension till rectification.</p>
15	Stored goods are packed but not marked. There is no separate part for Organic Product (OP) in warehouse	Major	<p>Time given for correction and if not done</p> <p>No TC shall be issued for all products in question till corrective action is taken.</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
16	Mixing organic goods, goods from transition period and conventional goods	Major	<p>In first phase the produce shall be liable for rejection. No TC shall be issued.</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
17	Storage of prohibited substances in the same space with organic products	Major	<p>Rejection of the produce where the prohibited substances have been stored No Transactions issued.</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further continuation will result in suspension/termination.</p>
18	Non maintenance of storage cleaning record	Minor	<p>Time given for correction and if not done</p> <p>NC shall be upgraded to Major if condition persists suspension till rectification.</p>
19	Organic products are not properly tagged/labeled	Minor	<p>Time given for correction and if not done</p>



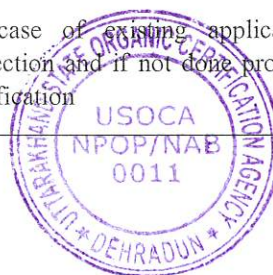
			NC shall be upgraded to Major if condition persists suspension till rectification..
20	Inadequate labeling of stored goods	Minor	Time given for correction and if not done NC shall be upgraded to Major if condition persists suspension till rectification..
21	Storage Issues (No clear separation, conditions of storage not good)	Major	Time given for correction  Additional/unannounced Inspections shall be planned to verify the situation and till then no transactions shall be issued for the said products.  Further continuation will result in suspension/termination.
22	Lack of details of Procurement	Major	If corrective measures are not feasible, certification might be refused for the new operator  For renewal: Time given for correction.  Suspension shall be initiated till rectification  No transaction shall be issued  Additional and unannounced inspections shall be done to verify the condition. Further continuation will result in suspension/termination,
23	Lack of Scope & Transactions Certificates	Major	If corrective measures are not feasible, certification might be refused for the new operator  For renewal: Time given for correction.  Suspension Shall be initiated till rectification  No transaction shall be issued  Additional and unannounced inspections shall be done to verify the condition. Further continuation will result in termination.
24	Lack of Warehouse layout	Minor	Time given for correction and if not done NC shall be upgraded to Major if condition persists Suspension shall be initiated till rectification
25	Comingling of organic products with conventional products	Major	All the stock will be considered as nil,  No transactions will be issued  Further Repetition will result in suspension/termination of scope
26	In absence of adequate cleaning and sanitation measures adopted, facility was not clean at the time of onsite inspection.	Major	Time given for correction  Additional/unannounced Inspections shall be planned to verify the condition  If not rectified no transaction shall be issued



			Further Repetition shall lead to suspension till rectification
27	Process flow chart of the products requested for certification does not comply with the machinery listed and available at the unit.	Major	<p>If corrective measures are not feasible, certification might be refused for the new operator</p> <p>For renewal: Time given for correction.</p> <p>Suspension Shall be initiated till rectification</p> <p>No transaction shall be issued</p> <p>Additional and unannounced inspections shall be done to verify the condition.</p> <p>Further continuation will result in termination.</p>
28	<p>Various sections of the processing unit were not clearly marked.</p> <p>Structural insect/pest management system has not been adequately adopted in the processing unit.</p>	Minor	<p>Time given for correction and if not done then NC shall be upgraded to Major if condition persists</p> <p>Additional/unannounced Inspections shall be planned to verify the situation.</p> <p>Further Repetition will result in suspension/termination of scope.</p>

#### C-WILD COLLECTION (NON-TIMBER FOREST PRODUCE AND HONEY):

S.No.	Condition for imposing sanctions	Non-Conformities/ Offences	Possible sanctions that shall be imposed
1	Area of collection is not properly identified on appropriate Maps	Minor	<p>Time given for correction and if not done then denial of certification for the new applicant</p> <p>In case of renewal scope If the physical conditions varied from the collection areas or areas that are not properly identified shall be rejected for certification.</p> <p>Repetition of the Noncompliance will lead to suspension till corrective action</p>
2	Fail to produce wild collection permission letter	Major	No Registration shall be done and in case of the scope renewal application shall not be processed; Denial for certification
3	Fail to produce approved product list/approved collector list	Major	<p>Time given for correction and if not done denial for certification for new applicant</p> <p>In case of existing applicant time given for correction and if not done project is suspended till rectification</p>



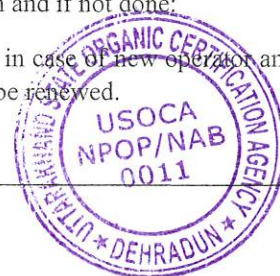


4	Contamination from nearby areas	Major	<p>warning shall be issued.</p> <p>Additional Inspections shall be planned to verify the situation.</p> <p>If not satisfied, product transactions shall be rejected and no TC shall be issued.</p> <p>Repetition shall leads to suspension/termination of scope depending upon the severity of the incidence.</p>
5	<p>Actual Production for honey and medicinal herbs has not been updated in the records.</p> <p>No other records are updated regarding the collection of honey and medicinal herbs.</p>	Major	<p>Time given for correction and if not done, no stock shall be updated /No transactions shall be issued.</p> <p>Repetition shall lead to suspension/termination of scope depending upon the severity of the incidence.</p>
6	Renewal agreement between operator and the collector (authorized by forest department) not available.	Major	<p>Time given for correction and if not done, no stock shall be updated /No transactions shall be issued.</p> <p>Repetition shall lead to suspension/termination of scope depending upon the severity of the incidence.</p>
7	Reused plastic bottles/containers have been used during time of collection of honey without the evidence of the cleaning measures adopted.	Major	<p>Time given for correction and if not done, no stock shall be updated /No transactions shall be issued.</p> <p>Repetition shall lead to suspension/termination of scope depending upon the severity of the incidence.</p>
8	No record available for the collected produce being verified by competent authority (Forest department).	Major	<p>Time given for correction and if not done; Depending upon the severity;</p> <p>No Produce collected shall be considered as organic. No stock shall be updated /No transactions shall be issued.</p> <p>Repetition shall lead to suspension till rectification</p>
9	No Transportation records available for the collected/harvested material from collection point to storage.	Major	<p>Time given for correction and if not done; Depending upon the severity;</p> <p>No Produce collected shall be considered as organic. No stock shall be updated /No transactions shall be issued.</p> <p>Repetition shall lead to suspension till rectification</p>



## D- BEE KEEPING:

S.No	Conditions for imposing Sanctions	Non-Conformity/ Offences	Possible Sanctions that shall be imposed
1	Adjoining land use shall pose a contamination risk to the apiaries if inappropriate management done.	Major	Denial of certification shall be done for new applicant.  In case of renewal: Time given for correction Additional Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Scope shall not be renewed.  No produce shall be updated as organic  No TC shall be issued.
2	No details of the feed given to the bees during lean periods.	Major	Communication to operator for justification.  Additional / unannounced Inspections shall be planned to verify the situation specially during the target periods.  If not satisfied, Total Production shall be rejected and no TC shall be issued.  Repetition shall lead to suspension till rectification
3	Reused plastic bottles/ containers have been used during time of collection of honey without the evidence of the cleaning measures adopted.	Major	Communication to operator for justification.  Additional / unannounced Inspections shall be planned to verify the situation.  If not satisfied, Total Production shall be rejected and no TC shall be issued.  Repetition shall lead to suspension till rectification
4	No Transportation records available for the collected material from collection point to storage.	Major	Time given for correction and if not done; Depending upon the severity; No Produce collected shall be considered as organic. No stock shall be updated /No transactions shall be issued.  Repetition shall lead to suspension till rectification
5	Training records for the workers engaged in the processing of organic products were not maintained adequately.	Minor	Time given for correction and if not done: NC shall be upgraded to Major.
6	No proof available for the Food Grade category of the packing material used.	Major	Time given for correction and if not done NO Transaction certificated shall be issued.
7	There is no written permission available from the competent authority for bee boxes	Major	Time given for correction and if not done;  No scope shall be issued in case of new operator and in case of renewal, scope shall not be renewed.

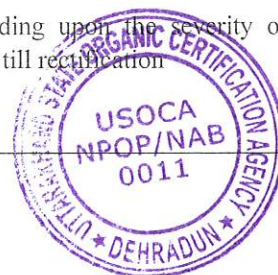




8	No records available which could prove that foundation comb has not been made from polystyrene and plastic material and has only been made from organic wax.	Major	Denial of certification shall be done for new applicant.  In case of renewal: Time given for correction Additional Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Scope shall not be renewed.
9	No records available for the treatments given to the bees and under what conditions	Major	Communication to operator for justification.  If not, project shall be suspended till justification documents received.
10	Incoming raw material does not correspond to the outgoing processed product and there is difference among the two as per the recovery percentage.	Major	Communication to operator for justification  No Produce collected shall be considered as organic. No stock shall be updated /No transactions shall be issued.  Repetition shall lead to suspension till rectification

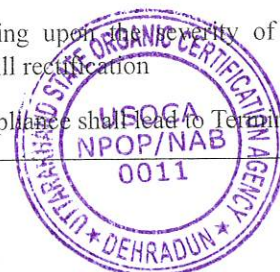
### E. Livestock Management:

S.No	Conditions for imposing Sanctions	Non-Conformity/Offences	Possible Sanctions that shall be imposed
1	Non maintenance of proper livestock records	Minor	Time given to the operator for corrective action and justification documents. If not, NC upgraded to major  Repetition of the noncompliance shall lead to suspension till rectification
2	Mild infraction of the rules of breeding (eg. Scale of the objects depart from the requirements of the regulations, but the animals are not endangered, and the manufacturer shall within a reasonable time apply appropriate measures)	Minor	Time given to the operator for corrective action and justification documents. If not, NC upgraded to major  Repetition of the noncompliance shall lead to suspension till rectification
3	Gross violation of the rules of breeding (a large number of animals in a small place, keeping in a cage, tying animals without explanation and permission)	Major	Denial of certification shall be done for new applicant.  In case of renewal: Time given for correction Additional Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification





4	Total number of cattle per hectare, exceeds the limit/ of 170kg N/ ha/year	Major	<p>Communication to operator for justification.</p> <p>If not, project shall be suspended till justification received to USOCA</p>
5	Methods not allowed for animal reproduction applied 6 without permission	Major	<p>Denial of certification shall be done for new applicant.</p> <p>In case of renewal: Time given for correction Additional Inspections shall be planned to verify the situation.</p> <p>If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification</p> <p>Repetition of the noncompliance shall lead to Termination</p>
6	Pastures used for grazing animals are from intensive conventional production (simultaneous grazing organic and conventional livestock)	Major	<p>Communication to operator for justification.</p> <p>Additional / unannounced Inspections shall be planned to verify the situation.</p> <p>If not satisfied, Project shall be suspended till rectification</p>
7	Facilities for keeping the cattle not provide conditions in accordance with Regulations	Major	<p>Denial of certification shall be done for new applicant.</p> <p>In case of renewal: Time given for correction Additional Inspections shall be planned to verify the situation.</p> <p>If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification</p> <p>Repetition of the noncompliance shall lead to Termination</p>
8	Open air areas for animals, not provided	Major	<p>Time given for correction Additional Inspections shall be planned to verify the situation.</p> <p>If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification</p>
9	Feed from own holding is not at least 50% of amount	Major	Denial of certification shall be done for new applicant.
10	Fail to maintain proper feed source record for outside feed	Major	<p>Time given for correction Additional/ Unannounced Inspections shall be planned to verify the situation.</p> <p>If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification</p>
11	Daily intake of roughage is not according to regulation	Major	<p>Denial of certification shall be done for new applicant.</p> <p>In case of renewal: Time given for corrective action Additional Inspections shall be planned to verify the situation.</p> <p>If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification</p> <p>Repetition of the noncompliance shall lead to Termination</p>

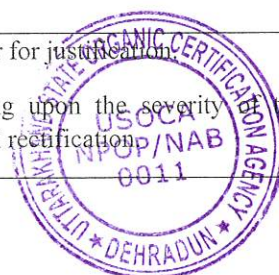


12	Participation of food from own pastures just involved in organic production exceeds	Minor	A time limit allowed for corrective action along with verification documents provided to USOCA, If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification
13	Participation of permitted conventional foods in non-ruminant exceed 5 %	Major	A time limit allowed for corrective action along with verification documents provided to USOCA.  If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification
14	Using non-permitted conventional food	Major	Denial of certification shall be done for new applicant.  In case of renewal: Time given for corrective action Additional Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification  Repetition of the noncompliance shall lead to Termination
15	Irreverence the appropriate proportions (fibers, silage, hay ...) in daily food intake	Minor	A time limit allowed for corrective action along with verification documents provided to USOCA, if not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification
16	Intentional use of prohibited substances or treatments in the preparation of animal feed (eg, antibiotics, hormones, substances to control reproduction, GMO	Major	Termination of Scope
17	Unintentional use of prohibited substances or treatments in the preparation of animal feed (eg, antibiotics, hormones, substances to control reproduction, GMO	Major	Communication to operator for justification.  Additional / unannounced Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic. Downgrading the status of the scope.  Repetition of the noncompliance shall lead to Termination
18	Violation of the rules for the purchase of animals without a permit	Major	Communication to operator for justification.  Additional / unannounced Inspections shall be planned to verify the situation.  If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic.  Repetition of the noncompliance shall lead to Termination
19	Using vitamins (in ruminants) without permission and use of veterinary drugs without supervision of veterinarian	Major	Communication to operator for justification.  Additional / unannounced Inspections shall be planned to verify the situation.  If not satisfied, Project shall be suspended till rectification





20	Mutilation without permission	Major	Communication to operator for justification. Additional / unannounced Inspections shall be planned to verify the situation. If not satisfied, Project shall be suspended till rectification
21	Irregular way of animal transport and bad treatment of them	Major	Communication to operator for justification. If not satisfied, Project shall be suspended till rectification Additional / unannounced Inspections shall be planned to verify the situation.
22	Documentation of the chemical composition of animal feed (macro- and micro- elements and trace elements) does not exist or deviating from the permitted	Major	Communication to operator for justification. Additional / unannounced Inspections shall be planned to verify the situation. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic Repetition of the noncompliance shall lead to Termination
23	Legal withdrawal period is not compiled	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic
24	Irrelevance the prescribed conversion period and related conditions	Major	Communication to operator for justification. No stock shall be updated as organic
25	Manure storage is not according to regulations  Sanitation practices for the cleaning of sheds and disposing of manure/excreta has not be adequately addressed.	Minor	Communication to operator for corrective action Is not satisfied NC shall be upgraded to Major Repetition of the noncompliance shall lead to suspension till rectification.
26	Use of unauthorized products for disinfecting of stables and related equipment	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. Additional / unannounced Inspections shall be planned to verify the situation
27	Use of Urea, DAP, chemical weedicides or any prohibited agro input in the organic pasture unit.	Major	Denial of certification for fresh applicant Termination of scope in case of renewal
28	Use of Off Farm input without proper justification and approval from USOCA.	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification





			Additional / unannounced Inspections shall be planned to verify the situation
29	Structural insect/pest management system has not been adequately adopted in the processing unit.	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic Additional / unannounced Inspections shall be planned to verify the situation
30	Training records for the workers engaged in the processing of organic products were not maintained adequately.	Minor	Communication to operator for corrective action. Is not satisfied NC shall be upgraded to Major
31	Processing records, incoming records and outgoing records, stock records have not been updated.	Minor	Communication to operator for corrective action. Is not satisfied NC shall be upgraded to Major
32	No internal quality check records were available.	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. Additional / unannounced Inspections shall be planned to verify the situation
33	No water test report available in records.	Minor	Communication to operator for corrective action. Is not satisfied NC shall be upgraded to Major
34	No records available for the isolation of the diseased animals	Major	Communication to operator for justification. If not satisfied; Depending upon the severity of the incidence: Suspension of the scope till rectification. No stock shall be updated as organic Additional / unannounced Inspections shall be planned to verify the situation
35	Sanitation practices for the cleaning of sheds and disposing of manure/excreta has not be adequately addressed.	Minor	Communication to operator for corrective action. Is not satisfied NC shall be upgraded to Major

