

Important : Important : Important

PVSM Gouri

Sent: Monday, February 06, 2012 12:00 PM

To: scsinfo@in.bureauveritas.com; office.india@ecocert.in; certification@ecocert.in; imoind@vsnl.com; info@indocert.org; info@laconindia.com; nocaindia@gmail.com; info@onecertasia.in; amresh.pandey@sgs.com; cuc@controlunion.in; maa@controlunion.in; uss_opca@rediffmail.com; ua_usoca@yahoo.co.in; info@usoca.org; aocabangalore@yahoo.co.in; rocajpr.cb@gmail.com; usha_preetham@yahoo.co.in; voca_org@yahoo.com; iscop_cbe@yahoo.in; profdrkkk@yahoo.com; foodcert@foodcert.in; aditiorganic@gmail.com; cgcert@gmail.com; tnocdcbe@gmail.com; ashish.gaur@intertek.com; mumbai@tuv-nord.com; md.mpsoca@gmail.com; info@biocertindia.com

Cc: Director; Reeba Abraham

Dear Certification Bodies,

As you are aware, the certification of organic cotton - lint cotton - cotton bales are covered under NPOP. Presently, from the stage of yarn till the textiles, it is covered under GOTS certification.

It has been observed that some of the Certification Bodies are not covering the lint and bales under NPOP and data is not available in Tracenet.

Therefore, it is advised that the inspection details and the related data up to bales preparation may be verified and covered under NPOP. Accordingly, you may enter the data in the Tracenet and in the annex of the scope certificate.

Regards,

Dr. PVSM Gouri
Advisor NAB

APEDA / ORW / ADV. / 205 / 2011-12 / 07

Different Registrations in tracenet for different activities of the operators under the Certification Body

PVSM Gouri

Sent: Wednesday, February 29, 2012 1:05 PM

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Cc: Director; Web Consultant; Sunil Kumar; A K Gupta; Man Prakash Vijay

Dear Certification Bodies,

To maintain the traceability of the product flow further, you are advised to inform your operators to register separately if they are carrying out different activities such as producers (exact address of production) processors (Processing unit address) and traders (Corporate office address) . The Certification Body is required to inspect separate activities of the operator separately

The ICS under contract with the traders / exporter are, required to register separately as grower group producers with name and full address of location (ICS place of operation). The mandator's name under contract with the specific ICS can be mentioned in bracket as managed by.....

We appreciate your cooperation and advise you to implement the above said requirement with immediate effect.

With best regards
Dr. PVSM Gouri
Advisor NAB

APEDA/ORU/ADV./205/2011-12/06

Procedures to be followed by all the CBs under NPOP for uniform implementation of organic certification programme

PVSM Gouri

Sent: Wednesday, February 22, 2012 1:40 PM

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Cc: Chairman; Director

Dear Certification Bodies,

We have noticed that that CBs are not following the norms of certification i.e., **conducting the physical inspection, closing of non conformities, updation of yield before the expiry of scope certificate**. The following discrepancies have been noticed.

1. Stock updation

You are advised to follow uniformity in the process and guide the operators to update the estimated yield before the external inspection for your verification. There are several instances that the crop was harvested in October/November and scope certificate got expired in December, but still the crop details were not updated in Trace Net. Later in February, request has been sent by the operators to the Trace Net team to allow the updation of those harvested crops. This also shows that the CB has not verified the crop details entered by the operator during external inspection. After the crop is harvested (Kharif and Rabi), the actual yield is required to be updated by the operator and verified by the CB before the expiry of scope certificate. Therefore, please note that the stock will not be updated after the issue of the renewal of scope certificate, but, if the crop is harvested after the renewal of scope certificate, the Trace Net will allow the actual yield updation and will be treated as the yield for the running year

2. Addition of crops/products

You are also advised to freeze the system plan with the crops (Kharif and Rabi) for certification before the external inspection, as the crops/products which are not mentioned in the scope certificate cannot be added in the Trace Net before expiry of the certificate.

3. Granting Organic status as per US NOP

As you are aware that as per US NOP requirement, all the crops including the annuals/biennials/perennials are required to **follow three years conversion period before granting the scope certificate as 'Organic'**. Therefore, the request from the

CBs and operators for allowing direct organic status after C2 i.e entering into C3 will not be accepted through Trace Net and the scope certificate for NOP is required to be generated as C3.

4. Request for addition of branded products in master list

The request to enter the names of the branded products in the master list will not be considered for addition in Trace Net such as Diabetic atta, herbal formulations etc. You are required to refer to the main ingredient in the product which has a HS code. If there is no HS code for the main ingredient, you may refer to APEDA.

5. Categorisation of non conformities

We have already shared the non conformities list (major, minor and OFI) with all the CBs. You are required to categorise the non conformities of your operators as per the list.

6. Submission of annual report

Even though the Trace Net is in operation, the CBs are required to submit the annual report by 15th April, 2012 related to the following in their certification programme

- new contracts outside India for private standard certification activities (textiles, aquaculture, Naturland, Demeter, Biosuisse, Bioinspecta, Soil association).
- New persons joined, change in the responsibilities of technical staff
- percentage of increase of projects under your certification programme,
- number of farmers registered and certified (ICS and individual),
- export data related to organic textiles
- export details to Japan and Taiwan
- per cent of sampling and detection of pesticides
- number of rejections of the consignments
- number of approvals given for use of India Organic logo
- per cent of unannounced inspections (list of projects inspected)
- No. of risk assessments carried out in a year
- No. of operators decertified
- No. of operators left the certification programme and joined other CB

Looking forward to your full cooperation for implementation of a uniform certification programmes among the Certification Bodies.

With Best regards,

Dr. PVSM Gouri
Advisor NAB

APE DA / ORU. / 205 / 2011-12 / 05

Organic cotton seeds

PVSM Gouri

Sent: Thursday, February 09, 2012 5:19 PM

To: scsinfo@in.bureauveritas.com; office.india@ecocert.in; certification@ecocert.in; imoind@vsnl.com; info@indocert.org; info@laconindia.com; nocaindia@gmail.com; info@oncertasia.in; amresh.pandey@sgs.com; cuc@controlunion.in; maa@controlunion.in; uss_opca@rediffmail.com; ua_usoca@yahoo.co.in; info@usoca.org; aocabangalore@yahoo.co.in; rocajpr.cb@gmail.com; usha_preetham@yahoo.co.in; voca_org@yahoo.com; iscop_cbe@yahoo.in; profdrkkk@yahoo.com; foodcert@foodcert.in; aditiorganic@gmail.com; cgcert@gmail.com; tnocdcbe@gmail.com; ashish.gaur@intertek.com; mumbai@tuv-nord.com; md.mpsoca@gmail.com; info@biocertindia.com

Dear Certification Bodies,

We have received a communication from M/s. Prathibha Syntex that they are into organic cotton seed production in 50 acres of land and the following organic certified seeds of around 1500 kg are available for sale with an expected yield of 10qt/Ha.

JK5, PA255, Jawahar Tapti

You may inform your cotton operators to source the organic cotton seeds from Prathibha Syntex at the following e-mail.

Mr. D.P.Arya - dpa@pratibhasyntex.com

Dr. PVSM Gouri
Advisor NAB

APEDA/ORG/205/2011-12/04

Documentation for ICS

PVSM Gouri

Sent: Tuesday, February 07, 2012 12:01 PM**To:** scsinfo@in.bureauveritas.com; office.india@ecocert.in; certification@ecocert.in; imoind@vsnl.com; info@indocert.org; info@laconindia.com; nocaindia@gmail.com; info@onecertasia.in; amresh.pandey@sgs.com; cuc@controlunion.in; maa@controlunion.in; uss_opca@rediffmail.com; ua_usoca@yahoo.co.in; info@usoca.org; aocabangalore@yahoo.co.in; rocajpr.cb@gmail.com; usha_preetham@yahoo.co.in; voca_org@yahoo.com; iscop_cbe@yahoo.in; profdrkkk@yahoo.com; foodcert@foodcert.in; aditiorganic@gmail.com; cgcert@gmail.com; tnocdcbe@gmail.com; ashish.gaur@intertek.com; mumbai@tuv-nord.com; md.mpsoca@gmail.com; info@biocertindia.com**Cc:** Director; Anju Kavi; Reeba Abraham; Web Consultant; Organic Division

Dear Certification Bodies,

It has been observed and reported by the Evaluation Committee members that even though the ICS are splited into 500 farmers each as per the notification of APEDA dated 17th June, 2010. However, the following lapses are been found in implementation.

1. Separate documentation of each splited ICS covering 500 farmers
2. The sample of inspection being carried for each 500 group by the external inspector
3. Risk assessment of each ICS
4. Closure of non conformities observed by the external inspectors
5. Communications with the ICS

In view of the above status, it is advised that the Certification Bodies may follow the above said procedures for certification of grower groups and enter the above said required information in the Tracenet.

With best regards,

Dr. PVSM Gouri
Advisor NAB

APEDA/ORG/205/2011-12/03

Product entry/ amendments in Tracenet

PVSM Gouri

Sent: Monday, February 06, 2012 12:23 PM

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Cc: Chairman; Director; Web Consultant; Organic Division

Dear Certification bodies,

It has been observed that in some cases related to value added processed products (juices/pasta/chutney/pappad/jam etc.), the Certification Bodies are not checking the ingredients and the preservatives being used in the processing of such products, before allowing the operator to register the products in Tracenet. As a result, many processed products are being processed without verification of the CB with the use of some processing aids or with preservatives which are not allowed under NPOP. For eg: sodium benzoate, preservative in juices is prohibited, but still the Certification body has allowed the operator to register under them through the Tracenet. Even though the Tracenet does not accept the query, there are several requests on the Tracenet for product addition by the operator recommended by the CB. This creates unnecessary wastage of time of the Tracenet group in responding to such uncalled queries.

In view of the above, it is requested that without studying the recipe of the value added products, in terms of ingredients and preservatives allowed in NPOP, may not be certified. The operator should be informed accordingly to avoid such lapses in certification in future.

In addition, I would also request that for any amendments to be made by the Tracenet team in entering the data/scope certificates/ TC, the request should be within seven days of the wrong entry. In future, request will not be entertained for any amendments in the entered data if it is after seven days of entry by either the operator or by the CB.

Regards,

Dr. PVSM Gouri
Advisor NAB