

## Discrepancies in the Tracenet usage by the CBs

PVSM Gouri

Sent: Tuesday, December 04, 2012 10:51 AM

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Cc: Chairman; Director; Sunil Kumar; Man Prakash Vijay; Samidha Gupta; Reeba Abraham; Anju Kavi; Web Consultant

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### Dear Certification bodies,

This is to inform you that we have been observing the following discrepancies in the details provided by the Certification Bodies in the Tracenet .

#### 1. Closing of the NCs

It has been noticed that the CB for the sake of issuance of scope and transaction certificates are closing the NCs abruptly writing sentences without any relation to the NCs raised just for the system to accept for scope generation.

This is a very serious concern and some of the CBs are being identified for following this procedure. This has been considered as a major non compliance in the procedures of the CB concerned. NAB has taken a serious view of these lapses by some of the Certification bodies.

#### 2. Granting the conversion status to C2/C3

For the sake of reduction of conversion status to C2/C3, the CBs are not verifying the authentic documents such as previous use of the cultivation, authorised signatories of the Sarpanch with date and seal.

#### 3. Location of the ICS

In spite of our communication through the advisory notes to the CBs, the details of location of the ICS (such as village, taluk, district, state) is not mentioned by the CBs on the scope certificates (eg: written as Dharwad1 ICS, Dharwad 2, Dharwad 3). This is resulting in duplicate certification of the same location by more than one CB.

#### 4. Registration of cultivable crops under wild collection

Some CBs have registered the annual cultivable crops under wild cultivation just to certify the products as organic.

The crop for considering under wild is required to be supported by a document that the area is under forest department by the authentic authorities failing which it will be considered as major procedural lapse of CB.

#### 4. Exact destination and transport date in domestic TC

CBs are required to mention the place of origin of product and destination clearly along with the buyer and seller details in the domestic TCs. The destination is given as India and the transport date is not mentioned. .

#### **5. Verification of estimated quantity**

The CBs are not verifying the estimated quantities of the products given by the producers on tracenet resulting in discrepancies in quantities in total production and certification.

The above discrepancies are resulting in uneven MIS report generation for proper assessment of the organic certification programmes in the country for submission further to the Ministry.

In view of the above procedural lapses, it is advised that all CBs under NPOP and NOP are required to follow NPOP seriously in their procedures of inspection and certification and proceed with the corrective actions immediately for maintaining the credibility of organic products in India.

The anomalies in the procedures of the CBs are being reviewed by the NAB regularly..

Best regards,

Dr. PVSM Gouri  
Advisor NAB

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## Advisory note for Tracenet operations

PVSM Gouri

**Sent:** Monday, December 17, 2012 5:41 PM

**To:** scsinfo@in.bureauveritas.com; office.india@ecocert.in; imoind@vsnl.com; info@indocert.org; info@laconindia.com; nocaindia@gmail.com; info@oncertasia.in; amresh.pandey@sgs.com; cuc@controlunion.in; info@usoca.org; rocajpr.cb@gmail.com; voca\_org@yahoo.com; iscop\_cbe@yahoo.in; 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; eia-delhi@eicindia.gov.in; directorosca@rediffmail.com; ota@otaindia.in

**Cc:** Chairman; Director; Sunil Kumar; Man Prakash Vijay; Samidha Gupta; Anju Kavi; Reeba Abraham; Organic Division

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### Dear Certification Bodies,

It has been observed during the reviewing of Tracenet entries that there are some not existing projects registered under the CBs , but the scope and Transaction Certificates have been issued. Such lapses will effect the credibility of the certification system under NPOP. *Please note that such lapses by the CBs will be informed to the NAB for necessary action .*

To bring in traceability of the existing operations and to maintain credibility of certification, we have decided the following :

#### 1. Discrepancies in the operators registration

All the scope certificates (grower group, individual, processor, trading) should have exact location address with **a legal identity with a registration No. of a SHG/ co-operative/NGO /export lience etc. All farms registered should enter the GPS co-ordinates of the farm. .**

#### 2. Shifting of operators to another CB

Please note that when an operator wants to shift to another CB, they are required to process their application with the existing CB three months before the expiry of the scope certificate. This will help in continuity of certification of the operator.

If this process is not followed and there is a discontinuity in the certification period, the second CB is required to impose minimum one year conversion period on the operator.

Without NOC ,CB cannot provide organic status directly to C3 .For continuity of the status of the transferred project , a NOC from the previous CB is required along with the status report .

#### 3. Duplicity of operators in Tracenet database

The operators who have not renewed the certificates with the Certification body should be deleted from the account. A provision will be made soon for deletion by the Certification Body. This will help in avoiding duplication of the projects under different CBs.

#### 4. Request for amendments in Tracenet

Please note that the amendments will not be made in the system for wrong entries by the operators or the CB after 15 days of data entry.

#### 5. Yield estimation

The yield estimation entered by the operator should be verified by the Certification body before the scope certificate is generated. No changes will be made thereafter.

The above said requirements will be from immediate effective effect, **but the requirement of legal entity of the ICS will be latest by 1st Febuary, 2013**. You are requested to inform your operators immediately about this requirement to enable them to register their ICS for legal entity.

Regards,

Dr. PVSM Gouri  
Advisor NAB