

Catalogue of Sanction:

Sanction	Action	Consequences
<p>M1 – Minor non-conformity that does not compromise the organic integrity of the product/operation.</p>	<p align="center">Warning</p>	<p>Non-conformities can be closed either before or after issuing the warning notice.</p> <p>Standing crop will not be considered in case of untimely submission of application.</p> <p>Requirement of training</p>
<p>M2 – Warning measure not implemented within the specified deadline or not fully implemented.</p>	<p align="center">Additional Inspection/ Suspension;</p> <p align="center">Rejection of application for new applicants</p>	<p>There is a possibility of losing the organic status of the products or new start of conversion period.</p> <p>If corrective action not taken timely leads to rejection of application in case of new application.</p>
<p>M3 – Major non-conformity impacting the organic status of the operation.</p>	<p align="center">Suspension /Withdrawal</p>	<p>Operator will be suspended or terminated depending on the severity of the non-compliance.</p> <p>Re-certification of terminated operators shall be as per the procedure under NPOP.</p>
<p>M4 – Major non-conformity that impacts the organic integrity of the products.</p>	<p align="center">Rejection of Lot/ Downgrade concerned lot/ Downgrade scope status</p>	<p>Concerned lot shall be treated as conventional. CB/exporters to be informed and the product shall be removed from supply chain. The status of the scope certificate shall be downgraded.</p>

Non-Compliance List

Sl. No.	Non-Compliance List	M1	M2	M3	M4
Application Form					
1.	Application is not submitted in accordance with the instructions of Certification Body	•			
2.	Giving incorrect/misleading data in Application	•	•		
3.	Deliberately omitting data in Application or in OSP for the organic production	•	•		
4.	The application was submitted in an untimely manner (e.g., after sowing)	•	•		
5.	If ICS manager/Authorized person not available on ICS site	•			
6.	During registration through NOC, operator fail to disclose the previous history/information to CB		•	•	•
Use of Land					
7.	Unauthorized use of land/ change of field during inspection		•	•	•
8.	There is no clear data of land (the basis of use, size of fields, etc.).	•	•		
9.	Lack of adequate buffer zone between conventional and organic land	•	•		•
Previous non-compliances					
10.	Delay in corrections of previous non compliances		•		
11.	Deficiencies that affect the certification were not corrected			•	•
Planting Material					

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12.	Using conventional untreated material without permission	•	•		•
13.	Use of materials treated with prohibited substances.			•	•
14.	The intentional use of GMO material			•	•
15.	Non intentional use of GMO material			•	•
16.	The origin of the own planting material cannot be verified as organic and there is no parallel production	•	•		
17.	The origin of the own planting material cannot be verified as organic and parallel production is present.	•	•		•
18.	Origin of purchased planting material cannot be proven; (organic- certified, conventional-declaration).		•		•
Parallel Production					
19.	No data are available on the parallel production (or submitted in an untimely manner) - in a case of first year of conversion	•	•		
20.	Production of the same or similar organic and conventional products, without possibility of separation during production, harvest or storage			•	•
21.	Deviation from the plan of conversion	•	•		
22.	Inadequate separation of organic and conventional products			•	•
Fertilizers And Plant Protection Products					
23.	The use of synthetic fertilizers				•
24.	The use of restricted fertilizers without permission			•	•

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25.	Excessive use of allowed fertilizers	•	•		
26.	The use of banned pesticides (including storage and treatment of stored products). If the results of the chemical analysis proved the presence of residues of prohibited substances			•	•
27.	Prohibited ingredient used in own farm prepared input preparation			•	•
28.	Drift of prohibited pesticides from adjacent plots / land			•	•
29.	Drift of prohibited pesticides from own conventional plots			•	•
30.	No records kept for use of plant protection products/ fertilizers	•	•		•
31.	Use of products containing GMOs or their derivatives			•	•
Crop Production					
32.	Slight deviation from the rules of crop rotation	•	•		
33.	Serious deviation from the rules of crop rotation without proper justification	•	•		
34.	Low proportion of legumes (below 15%), in production, if nitrogen is not even compensated with green manure or organic manures	•	•		
35.	The composition of the artificial cover is not based on polyethylene, polypropylene, or complex carbohydrates	•			
36.	Farm diaries are not maintained	•	•		
37.	There is no information on production quantities at the end of the harvest	•	•		•

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Processing & Handling					
38.	Ingredients in processing not identifiable as organic			•	•
39.	Cleaning before organic processing, when there's a time gap between them, cannot be verified	•	•		•
40.	In case of Parallel Production, the Producer handles both organic and conventional products in the same processing unit without proper separation			•	•
41.	No Organic Critical Control Plan developed or implemented	•	•		
Storage					
42.	Rented or own warehouse are not informed before storage of organic products	•	•		•
43.	In case of renting the warehouse, there is no rental agreement	•	•		
44.	Stored goods are packed but not marked. Separate part for Organic Product (OP) in warehouse	•	•		
45.	Stored goods are packed but not marked. There is no separate part for OP in warehouse	•	•		•
46.	Mixing organic goods, goods from transition period and conventional goods		•	•	•
47.	Storage of prohibited substances in the same space with organic products	•	•	•	•
48.	Storage of prohibited substances in the same space with an allowed plant protection products and fertilizers, without visual distinction, separation, without proper justification	•		•	
49.	Use of prohibited substances for disinfection of storage or irreverence of the prescribed periods before the products approved according to the requirements of organic production may be stored			•	•

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	(time which has to pass after their use)				
50.	Non maintenance of storage cleaning record	•	•		•
51.	organic products are not properly tagged/labeled	•	•		•
52.	Non maintenance of inward/outward storage record for warehouse/contracted storage area	•	•	•	•
Labeling					
53.	Inadequate labeling of stored goods	•	•		•
54.	Storage Issues (No clear separation, conditions of storage not good)	•	•		•
Documentation					
55.	Documentation: Minor defects which do not affect the issuance of certificates in record-keeping	•			
56.	Larger defects that affect the issuance of certificates in record-keeping (inability to secure traceability procurement, production and sales, there is no record of production - diaries, separation of conventional and organic farming in all phases is not documented, such documentation required by Certification Bodies (CBs) is not given in time)		•	•	•
57.	Disclosure of false information in documentation or hiding the data			•	•
58.	Documentation as required by CBs is not delivered in a timely manner or not delivered		•	•	•
Group certification					
59.	Reliable and practical applied internal control system is not established		•	•	•
60.	Internal inspectors do not have adequate knowledge of the organic production	•	•		

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61.	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)			•	•
62.	There are no records of internal controls that contain relevant information on production	•	•		
63.	Detailed authorized list of group members is not presented	•	•		
64.	Location of land and objectives involved in organic production are not clearly defined	•	•		
65.	Group members do not have a basic knowledge of organic production (measure depends on product type)	•	•		•
66.	Clear record of the measures applied in plant protection / fertilizers / animal treatment etc. is not evidenced		•	•	•
67.	System for separation of organic and conventional production and traceability is not provided			•	•
68.	Conflict for interest (COI) for all staff not available	•		•	
69.	farmer approval procedure not followed	•	•		
70.	farmer staff training calendar / record not available	•	•		
71.	Approved farmer list, project map, standard copy, ICS manual, legal record not available at ICS office	•	•		
Wild Collection					
72.	Area of collection is not properly identified on appropriate maps		•	•	•
73.	Fail to produce wild collection permission letter			•	•

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74.	Fail to produce approved product list/approved collector list			•	•
75.	Contamination from nearby areas	•			•
76.	Lack of proper records	•			
Trader					
77.	Lack of details of Procurement	•	•		•
78.	Lack of Scope & Transactions Certificates	•			
79.	Lack of Warehouse layout	•			
80.	Comingling of organic products with conventional products			•	•
Others					
81.	Missing the fixed inspection date	•			
82.	Falsification of documents		•	•	•
83.	Failure to comply with the provisions of the contract	•	•		

Note: In case of Crop Production/processing/Handling/Trading/Wild collection/Input Approval, the repeated Minor NCs shall be upgraded to Major NCs.