Section 4A

QUALITY COUNCIL OF INDIA

India Good Agricultural Practices (IndG.A.P.) Certification Scheme

Certification Process - Group Certification

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1. OBJECTIVE

To ensure an objective assessment and certification of the IndG.A.P. Group produce and promote uniformity in the operation of the certification scheme and the interaction between the Certification Bodies (CBs) and the Producer Group seeking certification.

2. SCOPE

This document covers the Group certification process of IndG.A.P. under Option 2 and Option 1 multisite with QMS to achieve certification.

Note: The certification shall be carried out by the Certification Bodies (CBs) duly accredited for the certification scheme as per ISO 17065 by NABCB. To operate under the Scheme, the CBs will require an extension of scope within the accreditation for ISO 17065.

2.1. Registration/Application for certification

2.1.1. Any farmer/producer/organization who is a legal entity can apply for certification to an approved CB.

Note- Option 1 will cover all elements described under clause 3.1 except 3.1.2 which will be treated in line with group certification

2.1.2. The application shall be made before harvesting of the crops.

2.1.3. All relevant information concerning farmer/producers applying for certification shall be recorded for the farmer/producer to become registered. This information will be used to supply the registered party with a unique client number, which will be used as a unique identifier for all certification activities.

2.1.4. The information required is consistent with the information of Certification Agreement signed between the farmer/producer and the CB. The following information is required for each farmer/producer wishing to be registered:

i. Name of producer/farmer to be certified,
ii. Annual Area under production,
iii. Farm produce to be covered,
iv. First harvest or further harvest details/timings.

2.1.5. The CB shall maintain and make publicly available accurate information describing its certification processes for granting, maintaining, extending, renewing, reducing, suspending or withdrawing certification, and geographical areas in which it operates. The information shall include reference to the

i. Certification Criteria,
ii. procedure for obtaining certification,
iii. an application form,

iv. list of documents required to be submitted along with the application,
v. information on fee for application, initial certification and continuing certification,
vi. documents describing the rights and duties of certified clients, and
vii. information on procedures for handling complaints and appeals.
viii. The producer has the right not to send certain requested documents to the CB if they are considered to be confidential. In this case the information will have to be present during the on-site inspection.

2.1.6. The CB shall respond to all enquiries received from prospective applicants for certification with complete information for facilitating a registration of an applicant, within seven days of receipt of the query.

2.1.7. The prospective applicant shall apply to the CB on the Application form prescribed by the CB, and provide as minimum information on:

i. the name and address of applicant with contact details (Both physical and postal Address shall include name of city, District, State and country, postal code and also the contact and fax numbers if available)
ii. proof of legal entity,
iii. Production location and total land held at location,
iv. whether land is held under ownership or lease,
v. produce being Produced /handled,
vi. relevant certification criteria and option of IndG.A.P. against which certification is sought,
vii. Details of Produce handling (shall include name of produce handling unit, full address with name of city, District, State and country, postal code and also the contact and fax numbers and email and GLN / Sub GLN if available)
viii. number and competence of manpower (multisite or group farming) to be registered with CB which in turn will share details with IndG.A.P. Sectt. It is the responsibility of the producer and CB to update the data.
ix. area under cultivation non covered crop, first harvest and further harvest
x. area under cultivation covered crop, first harvest and further harvest
xi. Since when the area is under cultivation
xii. Any registration with government department
xiii. Email of applicant (if available)
xiv. GLN (if available)
xv. Latitude and Longitude of Legal entity (+ - 10 m accuracy)
xvi. Full name of Responsible person on behalf of legal entity with contact number full address, fax, email as per availability
xvii. Details on parallel production and parallel ownership (If any). Parallel production is allowed only if the crop can clearly be distinguished by an average consumer at harvesting stage (eg: red apple and green apple).
xviii. Details of sub contracted operations (if any)
xix. Details of Certification bodies if any other products registered with other CBs
xx. Countries/ Group of countries of destination of produce
xxi. Harvest can be excluded from the scope of certification only if the produce is sold before harvest and the ownership of produce is no more with the certificate holder, part of the harvest cannot be excluded. And this information shall be available in the application the producer has to declare that PHI is complied with and pass on that information to buyer.
xxii. Inclusion of harvest is mandatory as long as the produce under harvest is under the ownership to the producer during harvest even if harvest is a sub-contracted

operation. A written contract shall be executed between the producer and buyer mentioning the IndG.A.P. requirement for harvest exclusion. During application if the producer is not sure of buyer/buyers then a declaration stating that the information will be passed on to the CB as soon as the buyer is identified. The buyer also has the responsibility of handling the produce not just harvesting.

xxiii. If produce handling is included then whether certified and non certified produce handled in the same produce handling unit.

This information shall be updated whenever it changes latest it shall be updated before renewal.

Note:- Produce handling includes any operations after harvest including storage, chemical treatments, trimming, thinning, washing, packing or other operations were the produce will have physical contact with other substances or materials. Any specific processes for produce shall be captured in the check list

2.1.8. The prospective applicant shall along with the application, pay all applicable fees, declare any judicial proceedings relating to their operations/product, any proceedings by any regulatory body or suspension/cancellation/withdrawal of any certification/approvals under any regulations or otherwise.

2.1.9. Certification is granted only against the relevant certification criteria. The CB shall review all applications for the above and ensure the same.

2.1.10. All applications for certification shall be reviewed by the CB for adequacy and deficiencies observed, if any, shall be informed to applicant within seven days of receipt of application. Review of applications shall be done by a competent person. Records of review shall be maintained.

2.1.11. The applications found to be complete and supported with all documents sought shall be accepted and registered in order of receipt with a unique identification number, acknowledged and records maintained. Registration should be done within seven days of receipt.

2.1.12. Antecedents of applications shall be verified. If punished under the law, the application from the same person/organization will not be entertained during the period of punishment and in any case for at least one year from the date of punishment.

2.1.13. Applications from farmers/producers who have earlier either misused the Certification/ certification mark, or whose earlier certificate was cancelled because of violation of terms and conditions/misuse of certification mark shall not be entertained within one year of cancellation of the certificate by any CB.

2.1.14. Applications from farmer/producer found to be misusing the Certification/certification Mark while their application is being processed for grant of certificate, shall not be processed any further, and rejected after giving a due notice of 15 days. Fresh applications from them shall be treated as per clause 4.1.13 given above.

2.1.15. Requests for grant of certificates from ex-applicants shall be processed like a fresh applicant and the entire procedure for grant of certificate be adhered to.

2.1.16. Certification Bodies shall reject or close an application under the following conditions:

- If Initial Evaluation is not carried out within six months of registration of application,
- If the follow up evaluation carried out after organization has confirmed necessary corrective actions is not satisfactory
- Lack of competent personnel for production/cultivation and handling,
- If farmer/producer shows no progress towards completion of corrective actions within three months of Initial Evaluation and six months of Registration of application,
- Misuse of Certification/certification mark, Evidence of malpractice and
- Voluntary withdrawal of application.

2.1.17. In the event of closure/rejection of an application, the application fee submitted with the application may be refunded as decided by the CB.

2.1.18. An applicant:

2.1.18.1. May not register the same product more than once with different CBs or under different certification options.

2.1.18.2. May register different products with different CBs and/or under different certification options (e.g.: It is possible to register apples under Option 1 and cherries under Option 2, apples with one CB and cherries with another CB or both crops with the same CB). The application of the CB requires the applicant to confirm that there is no duplication in terms of seeking certification.

2.1.18.3. May not register production sites or group members in different countries with any CB. The IndG.A.P. Secretariat may grant exceptions on a case-by-case basis or as per national interpretation guidelines. The limiting criteria for easiness in operations is that QMS / PG Border limit within 50 km from operation office of PHU / Packhouse for perishable products and 100 km for non-perishable products. Average number of Producer members can be 50 of average 2-hectare limit per 1 extension officer for first year of implementation.

2.1.19. For the registration to be completed, the applicant shall satisfy all the following conditions:

2.1.19.1. Submit to the CB the relevant application that shall include all the necessary information.

2.1.19.2. Sign acceptance of the IndG.A.P. Sublicense and Certification Agreement' in its latest version (available on the QCI website) with the CB, or the applicant shall explicitly acknowledge the receipt and the inclusion of the IndG.A.P. Sublicense and Certification Agreement' with signature on the service contract/agreement with the CB and the CB shall hand over a copy of the IndG.A.P. Sublicense and Certification Agreement' to the producer.

2.1.19.3. Be assigned a UIN after completion of first certification process (as per Section 3 Annexure 3C – Seed to Sale (S2S) Rules; clause 6.1 - SOP for issuing Unique Identification Number), if they don't already have a UIN.

2.1.19.4. Agree in writing to pay the IndG.A.P. registration fee, as explained in the current IndG.A.P. Fee Table' (available on the QCI website).

2.1.20. The registration process, in case of initial certification and transfers, shall be finalized before inspection can take place.

2.1.21. In the case of first registration, the CB shall confirm about the receipt of application and that the application is in order.

2.1.22. Production Site is defined as a production area (e.g., fields, plots, ponds, ranches) that is owned or rented and ultimately managed by one legal entity, and where the same input factors (e.g. water supply, workers, equipment, stores, etc.) are used.

2.1.22.1. One site (farm) may contain several touching areas (plot: areas that share a common border, are contiguous) and production of more than one product on the same site is possible. the multisite may contain several non-touching areas (fields: areas that do not share a common border, are non-contiguous) and production of more than one product on the same site is possible.

2.1.22.2. All production sites where the product(s) that are included in the IndG.A.P. certification scope are produced, shall be identified and registered.

2.1.23. Requirements for production sites:

2.1.23.1. All production sites shall be owned or rented and under the direct control of the legal entity.

2.1.23.2. For production sites that are not owned by the legal entity, there shall be a signed document, which includes a clear indication that the site owner does not have any responsibility or input or decision capacity regarding the production operations over the rented-out site. There shall also be written contracts in force between each production site owner and the legal entity that include the following elements:

a. Certificate holder/producer member name and legal identification.
b. Name and/or legal identification of the site owner.
c. Site owner contact address.
d. Details of the individual production sites.
e. Signature of both parties' representatives.

2.1.23.3. The certificate holder is legally responsible for all the registered production, including placing the product on the market.

2.1.24. A product handling unit (PHU) is defined as facilities where products are handled. If a producer handles products included in the IndG.A.P. certification scope in more than one PHU, all these shall be identified and registered.

2.1.25. Registration / Transfer with a new CB

2.1.25.1. If a producer who has already been registered changes CB or applies to a new CB for certification of a different product, the producer shall communicate the UIN to the new CB. Failure to do so will result will result in aborting the process for both Option 1 producer and Option 2 producer group.

2.1.25.2. Certificate holders who are sanctioned cannot change CB until the outgoing CB closes the corresponding non-conformance.

2.1.25.3. Individual producer members of a producer group are not allowed to leave the group and register with another group (for the products registered) if there is any pending sanction on the producer issued by the group, or there are any issues relevant to the producer raised by the CB that have not been closed.

2.1.26. Parallel Production (PP) or Parallel Ownership (PO)

2.1.26.1. Any applicant/certificate holder (individual producer, multisite producer or producer group) who owns IndG.A.P. and non-IndG.A.P. products (of the same product) at any time needs to register for parallel production (PP) or parallel Ownership (PO).

2.1.26.2. Registration Steps

a. The producer shall inform the respective CB of the application for PP/PO during the registration process.
   - Producer groups shall also include clear identification of their producer members who buy/sell non-certified products of the same products included in the scope of certification (and, therefore, also the products that have to be registered as “with PO” for each producer member).

b. The CB shall register the producer (per product) in the IndG.A.P. Database for PP and/or PO.

c. Producers can register for PP/PO at any time if they start carrying out PP/PO activities but cannot use the registration as immediate corrective action to avoid sanctions in the case of a non-conformance.
   - If a non-conformance is detected, the producer shall be sanctioned accordingly until effective implementation of the corrective actions for the entire production process has taken place.
   - In case producers want to register for PP/PO during the validity of their certificates (e.g. because they need to purchase certified products, which they did not expect at the time of their registration), CBs will have to carry out an extraordinary inspection/audit to check the applicable control points and update the information in the their Database and the paper certificate.
   - In case producers want to register for parallel ownership at the beginning of the season, when they are not sure whether they will buy non-certified products, CBs shall evaluate that the traceability and segregation procedures are available and ready for implementation. When the purchase of products from non-certified sources begins, CBs shall require evidences of implementation (documentation or on-site assessment).

2.1.26.3. Identification of Producers Registered for PP/PO

a. The UIN is used to validate the certificate. It is made available via the identification of the final products with the producer, where the product originates from a certified process, which is an obligation for all producers registered for PP/PO.

b. PP/PO shall be specified on the paper certificate and is also visible via the online certificate validation in the IndG.A.P. website.

2.1.26.4. Additional Requirements for Producers with PP/PO

a. All products shall be traceable to the respective production site/PHU, and certified and non-certified products shall be fully segregated at all times. Producers shall be able to demonstrate that their traceability and recording system guarantees full traceability and segregation.

b. The handling of certified and non-certified products is possible within the same product handling facility.

c. Parallel production in one production site is not allowed. Exceptions, when possible, are explained in the respective scope-specific rules.

2.1.27. Burden of Proof

2.1.27.1. In the case of information (e.g. MRL exceedance, microbial contamination, etc.) about a certificate holder, which could have a potential impact on the certified status/claim being transmitted to the IndG.A.P. Secretariat, it is the responsibility of the certificate holders and the corresponding CBs to refute the claim by verifying and p The findings and actions taken shall be reported to the IndG.A.P. Secretariat within the defined period of time by the CB. providing evidence of compliance with the IndG.A.P. standards.

2.1.27.2. The findings and actions taken shall be reported to the IndG.A.P. Secretariat within the defined period of time by the CB.

2.1.27.3. If the certificate holders and the corresponding CBs do not provide the requested evidence of compliance within the period of time defined by the Scheme Owner, they will be sanctioned according to the sanctioning procedures described in the Certification Process (Section 3).

2.1.27.4. In case the evidence includes laboratory analyses, accredited laboratories (ISO 17025) and independent sampling.

3. CERTIFICATION PROCESS- OPTION 2 GROUP CERTIFICATION

3.1 Legality, Administration and Structure

3.1.1 The Producer Group shall be registered legal entity as Producers Management Unit, producer companies, exporters etc. This legal entity shall have ultimate responsibility over the production, handling and ownership of the produce; thus, it is responsible for the compliance with the standard.

3.1.2 The legal entity shall enter into a contractual relationship and will have Certification Agreement with approved CB, and becomes the sole holder of the certificate. This agreement should be valid for minimum one year and maximum three years and after that it should be renewed in total.

3.2 Requirement of producer groups

3.2.1 The administrative structure of the producer group shall be documented and clearly identify the relationship between the producers and the legal entity. There shall be written signed contracts between each producer and the legal entity. The contracts shall include the following elements:

a) Name and legal identification of the producer,
b) Name of the contact person, another person responsible in case the first one is absent or not available
c) Full address (physical and postal)
d) Contact address, including whatsapp no. if available
e) Other ID (PAN, GST, UAIDI, etc.), driving license,
f) Products registered
g) Details of the individual production locations, full address (physical and postal)
h) Details of areas (crops) or quantity (Tonnage),
i) Commitment to comply with the requirements of the standard,
j) Agreement to comply with the group's documented procedures, policies,
k) Signature of producer and group representative and,

l) Any other internal requirements not being met.

3.2.2 The producer group registered members must be legally responsible for their respective production locations.

3.2.3 Requirements for multi-sites

a) All PMUs shall be owned or rented and under the direct control of the legal entity
b) For PMUs that are not owned by the legal entity, there shall be written contract in force between each PMU owner and the legal entity. The contract shall include the following elements:
   i. Name of legal entity and its legal identification,
   ii. Name and/or legal identification of the site owner,
   iii. Site owner contact address,
   iv. Details of individual PMUs,
   v. Signature of both parties' representatives.
c) The certificate holder is legally responsible for all the registered production including placing the product on the market.

3.2.4 Producer and site internal register

A register shall be maintained of all contracted group member producers, and of all the applicable sites used for production in accordance with the standard.

a) Requirements of producer groups

i. All producers in the producer group internal register must be registered individually.
ii. The register shall at least contain the following information for each producer:
   - Name of producer,
   - Name of contact person,
   - Full address (physical and postal),
   - Contact data (telephone number and e-mail and/or fax number),
   - Other ID (GST Number, PAN, TIN, Aadhar etc.),
   - Produce registered,
   - Growing/Production area and/or quantity for each registered produce,
   - IndG.A.P. status

b) Requirements of multisites

i. Additionally, the register shall at least contain the following information for each site:
   - Relation of legal entity with PMU (ownership, rented etc.)
   - PMU location
   - Product registered
   - Growing/Production area and/or quantity for each registered produce

4. QUALITY MANAGEMENT SYSTEM OF GROUP FACILITY

4.1 Management and Organization

4.1.1 Structure

a) The structure should enable the appropriate implementation of QMS across all registered producer members or PMUs.
b) The producer group or PMU shall have a management structure and sufficient suitably trained resources to effectively ensure that the registered producers meet the requirements of IndG.A.P. on their production locations.
c) The organizational structure of the group shall be documented and shall include individuals responsible for:
   i. Managing the implementation of IndG.A.P. in the group.
   ii. Managing the QMS
   iii. The Internal inspection of each producer member and/or PMU annually (i.e., internal Inspectors)
   iv. The Internal audit of the Quality Management System and verifying internal inspections (i.e., Internal Auditors)
   v. Technical advice to the group (depending on the scope of the group). This could be the same person as above.

4.1.2 Responsibility and Duties

The duties and responsibilities of all personnel involved with the compliance of IndG.A.P. requirements shall be documented, and an individual who holds a position of sufficient seniority and resources to serve as the overall responsible person will be nominated for maintenance of the IndG.A.P. certification.

4.1.3 Competency and Training of Staff

a) The management shall ensure that all personnel with responsibility for compliance with the IndG.A.P. standard is adequately trained and meet defined competency requirements. They shall possess degree /diploma in agricultural sciences with suitable training.
b) The competency requirements, training and qualifications for key staff shall be documented and shall meet any defined competency requirements.
c) Records of qualifications and training shall be maintained for all key staff (managers, auditors, inspectors, etc.) involved in compliance with IndG.A.P. requirements to demonstrate competence.
d) The internal auditor(s) and inspector(s) shall undergo training and evaluation on the job audits/inspections to ensure consistency in their approach and interpretation of the standard. The key tasks and specific competency requirements is given in clause 5 of this section.
e) Systems shall be in place to demonstrate that key staff is informed and aware of development, issues and legislative changes relevant to the compliance to the IndG.A.P. standard.

4.2 Document control

a) All documentation relevant to the operation of QMS for IndG.A.P. compliance shall be controlled. This documentation shall include:
   i. Quality Manual
   ii. Operating procedures,
   iii. Work instructions
   iv. Recording forms
   v. Relevant documents of external origin
b) Policies and procedures shall be sufficiently detailed to demonstrate the group's control of the principal requirements of the IndG.A.P. standard.
c) Relevant procedures and policies available to the producer group registered members and key staff.
d) Quality Manual shall be reviewed periodically to ensure that it continues to meet the requirements of the IndG.A.P. standard and those of the producer group. Any relevant modifications of the IndG.A.P. standard or published guidelines that come into force must be incorporated into the manual within the time period specified.
e) The manual shall be reviewed a minimum of once a year.

4.2.1 Document Control Requirements

a) There shall be a written procedure defining the control of documents.
b) All documentation shall be reviewed and approved by authorised personnel before issue and distribution.
c) All controlled documents shall be identified with an issue number, issue date/review date and be appropriately paged.
d) Any change in these documents shall be reviewed and approved by authorised personnel prior to its distribution.
e) A copy of all relevant documentation shall be available at the places where the QMS is being controlled.
f) There shall be a system in place to ensure that documentation is reviewed and that following the issue of new documents, obsolete documents are effectively rescinded.
g) The documents of external origin used in the management of Group Certification shall be controlled.

4.2.2 Records

a) There shall be records to demonstrate effective control of the IndG.A.P. Quality Management System requirements and compliance with the requirements of GAP standard.
b) Records from the QMS related to compliance of IndG.A.P. requirements shall be kept for a minimum of 3 years.
c) Records shall be genuine, legible, stored and maintained in suitable conditions and shall be accessible for inspection as required.
d) Records that are kept on-line or electronically are valid. If a signature is required, this can be a password or electronic signature that ensures the unique reference and authorization

of the person signing. If a written signature of the responsible person is needed then this must be present. The electronic records must be available during the CB inspections. Back-ups must be available at all times.

4.3 Complaint Handling

4.3.1 There shall be a system for effectively managing customer complaints and the relevant part of the complaint system shall be available to the producer members.

4.3.2 There shall be documented procedure that describes how complaints are received, registered, identified, investigated, followed up and reviewed.

4.3.3 The procedure shall be available to customers as required.

4.3.4 The procedure shall cover both complaints to the group and against individual producers or sites.

4.3.5 The entity shall demonstrate the compliance to the above requirements in form of a registry of complaints and information flow to the CBs or the Scheme Owner.

4.4 Internal Audits and Inspections

Internal audit systems shall be in place both to assess the adequacy and compliance of the documented QMS and to inspect the producers and farms against the GAP standard.

4.4.1 Internal Quality Management System Audit

a) The QMS for the IndG.A.P. scheme shall be audited at least annually.
b) Internal auditors shall be suitably trained and independent of the area being audited.
c) The CB will evaluate the competence of the internal auditor during the external audit

Note- It is permitted for the same person to initially develop the QMS within the group, and then undertake the required annual QMS audit, however the person responsible for the day-to-day ongoing management of the QMS is not allowed to undertake the required subsequent annual internal QMS audits.

d) Records of the internal audit plan, audit findings and follow up of corrective actions resulting from an audit shall be maintained and available.
e) Completed QMS checklist with comments for every QMS control point must be available on site for review by the auditor during external audit
f) Where the internal audit is not performed in one day but continuously over a 12-month period, a predefined schedule should be in place.

4.4.2 Internal Producer and Production Management Unit (PMU) Inspections

a) Inspections shall be carried out at each registered producer (and corresponding production locations) or PMU at least once a year against all GAP control point and compliance criteria. The Control Points and Compliance Criteria (CPCC) checklist based on respective IndG.A.P. standards shall be used both for internal and external assessments. Any producer opting for IndG.A.P. needs to comply with Section 3. If a group of farmers join to seek a group certification, the legal entity needs to comply with requirements stipulated in Section 4A and the farm with the requirement of section-3
b) All critical, Major and Minor control points must be inspected in full.
c) Internal inspectors shall meet competence requirements.

d) Internal inspectors shall be independent of the area being audited. Internal inspector cannot inspect their own daily work
e) New members of the group and new PMUs shall always be internally inspected and approved prior to entering into internal GAP register.
f) The original inspection reports and notes shall be maintained and available for the CB inspection as required.
g) The inspection report shall contain the following information:
    i. Identification of registered producer and/or production location(s)
    ii. Signature of the registered producer or PMU responsible
    iii. Date of inspection
    iv. Inspector name and signature
    v. Registered products
    vi. Evaluation result against each GAP control point
    vii. The checklist shall include details in the comments section for the:
        - Critical control points that are found to be compliant,
        - Critical and Major control points that are found to be noncompliant and,
        - Major and minor control points that are found to be noncompliant unless a checklist is issued by IndG.A.P. that predetermines which CPCC must be commented on. This is needed, in order to enable the audit trail to be reviewed after the event,
        - All CPs that are not applicable needs an explanation justifying the same.
    viii. Details of any non-compliances identified and time period for corrective action,
    ix. Inspection results with calculation of compliance
    x. Duration of inspection
    xi. Name of internal auditor who approved the checklist
        - The internal auditor / audit team shall review and make the decision on whether the producer or site is compliant with the GAP requirements, based on the inspection reports presented by the internal inspector,
        - In case there is only one internal auditor who also performs internal inspection, another person i.e., MR must approve the internal inspections,
        - Where the internal inspection takes place continuously over a 12-month period, a predefined schedule should be in place.

4.5 Non-compliances, Corrective Actions and Sanctions

4.5.1 There shall be a procedure to handle non-compliances and corrective actions which may result from internal or external audits and/or inspections, customer complaints or failures of the QMS,

4.5.2 There shall be documented procedures for the identification and evaluation of non-compliances to the QMS by the group or by its members,

4.5.3 Corrective actions following non-compliances shall be evaluated and a timescale defined for action,

4.5.4 Responsibility for implementing and resolving corrective actions shall be defined,

4.5.5 A system of sanctions and non-conformances shall be operated with their producers or PMU that meet the certification requirement,

4.5.6 The group shall have mechanisms in place to notify the IndG.A.P. approved Certification Body immediately of Suspensions or Cancellations of registered producers,

4.5.7 Records shall be maintained of all sanctions including evidence of subsequent, corrective actions and decision-making processes.

4.6 Product Traceability and Segregation

4.6.1 Product meeting the requirements of the IndG.A.P. standard and marketed as such shall be traceable and handled in a manner that prevents mixing with non-IndG.A.P. approved products.

4.6.2 There shall be a documented procedure for the identification of registered produce and to enable traceability of all product, both conforming and non-conforming to the applicable production sites. A mass balance exercise must be carried out to demonstrate compliance within the legal entity.

4.6.3 Effective systems and procedures shall be in place to negate any risk of misuse of label or mixing of GAP certified and non-GAP certified products.

4.7 Withdrawal and Recall of Certified Produce

4.7.1 Documented procedures shall be in place to effectively manage the withdrawal and recall of registered product.

4.7.2 Procedures shall identify the types of events which may result in a withdrawal, recall and persons responsible for taking decisions on the possible withdrawal of product, the mechanism for notifying customers and the Certification Body; and methods of reconciling stock.

4.7.3 The procedure shall be capable of being operated at any time.

4.7.4 The procedure shall be tested in an appropriate manner at least annually to ensure that it is effective and records of the test retained.

4.7.5 During the mock recall, the entity preferably needs to furnish evidence of communicating the same to the client whereas, it is not necessary to have the CB or the regulator involved in the mock recall process.

4.8 Subcontractors

4.8.1 Procedures shall exist to ensure that any services subcontracted to third parties are carried out in accordance with the requirements of the IndG.A.P. standard.

4.8.2 Records shall be maintained to demonstrate that the competency of any subcontractor is assessed and meets the requirements of the standard.

4.8.3 Subcontractors shall work in accordance with the group's QMS and relevant procedures and this shall be specified in service level agreements or contracts.

4.9 Registration of additional producers or PMU to the certificate

New producers and sites may be added to the certificate. In fact, it is the responsibility of the certificate holder (Group or multisite) to immediately update the certification body on any addition or withdrawal of sites to/from the list of registered producers.

4.9.1 In case certifications up to 10% producer members or site or area of production whichever is less may be added to the existing certificate without doing an external audit by the CB and for the subsequent unannounced surveillance this has to be considered in the calculation of square root of producers/production sites.

4.9.2 When the number of the approved registered producer and/or sites increases by more than 10% in one year, further external sample inspection (minimum is the square root of new producers/sites) of the newly added producer sites and optionally an audit of QMS

will be required during that year before additional producers can be added to the approved list.

4.9.3 Regardless of percentage by which the number of registered producer sites increase in one year, should the newly registered farm increase the area of previously approved registered products by more than 10% in a year or there is 10% change in producer further external sample inspection (minimum is the square root of new producers/farms) of the newly added farms or producers and optionally an audit of QMS will be required during that year before additional farms/ producers can be added to the approved list.

5. INTERNAL AUDITOR AND INSPECTORS' REQUIREMENTS

5.1 Key task:- the internal inspector/s has to complete the internal inspection of all producer members of the group/ sites in case of multi sites with QMS to access compliance with the IndG.A.P. certification requirements. And shall not undertake auditor's task They shall produce timely and accurate reports for the inspection done by them.

The internal auditor has to complete the QMS audit, approval of the producer members/sites based on the internal inspection reports/ check list submitted by internal inspector. They shall produce timely and accurate reports for the audit done by them.

5.2 Educational Qualification and experience

5.2.1 Degree/ Diploma and/or Post-secondary education in any stream of science relevant to agriculture, horticulture, soil sciences or agroforestry areas, sufficient to provide knowledge of basic microbiology, agronomy, plant entomology and pathology, and hygienic conditions in the production and processing of horticulture crops as relevant to the crops certified.

5.2.2 The auditor/Inspectors shall have at least 2 years of post-qualification experience in horticulture or agriculture production, The number of years of total work experience may be reduced by one year if the auditor has completed appropriate post graduate education in the education relevant to horticulture and/or agriculture sector.

5.3 Technical skills and qualifications

5.3.1 Sign off of the inspector shall be done only on completion of one day practical inspection course (ISO19011) on basic principles of inspections, and also 2 observed audits with already qualified inspector/auditors can be internal or external and a witness audit by already qualified auditor/inspector or by CB

5.3.2 For auditors, practical knowledge on the quality management system and a minimum of internal auditor training on QMS for a minimum duration of 16 hours.

5.4 Food safety and GAP trainings

5.4.1 HACCP trainings as a part of the formal qualification or by completing a formal course, (Thirds party trainings and the trainer need to be a LA trained person on HACCP or ISO 22000/FSMS)

5.4.2 Food hygiene training as a part of the formal qualification or a formal training course.

5.5 Crop specific training

5.5.1 Training in Plant protection product, Fertilizers, Integrated Pest management as part of the formal course and training from specialist in the respective field.

5.6 Working language skills and product knowledge

5.6.1 The auditors and inspectors shall have practical knowledge on the product they are inspecting and shall be familiar with the local language or national language or a language which both (auditee and auditor) can communicate. Any exemption to this shall be consulted with SO and permission to be sought before inspection/audit.

5.7 Independence and confidentiality

5.7.1 The inspector auditor shall sign confidentiality agreement and any conflict shall be declared to the group. And shall maintain strict confidentiality regarding the information and records.

5.7.2 The inspectors and auditors shall not do the inspection and audits if they have worked, given consultation etc., to the client/ producers during the past 2 years.

Note:- All qualifications, trainings and experience records shall be maintained by the Group for verification by the CB during external audit.