

Inspection Report Processing /Trade USDA NOP

All questions according to, USDA NOP

INDOCERT
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Information about operator	Information about inspection
INDOCERT No.	Inspector BABEESH BHASKARAN
Trace net No:	Email address: babeesh@indocert.org
Name SRISTI BIOSCIENCES PVT LTD (Karakapatla Unit)	Date of inspection 03-03-2015
Address: DOOR NO: 11-09-24/104 , PLOT NO – 2, 104, SUSTHIRALOK COMPLEX , OMNI HOSPITAL LANE , OPPP. MAHALAKSHMI THEATRE, KOTHAPET , HYDERABAD , TELANGANA	Inspection time including report writing time: from.....until.....o'clock 2 day
Postal Code/City 500060 State: TELANGANA	
Phone/Fax 040-65794668 Email: jayaram@sristibiosciences.com	<input checked="" type="checkbox"/> first inspection <input type="checkbox"/> regular inspection <input type="checkbox"/> unannounced inspection <input type="checkbox"/> re inspection according to
Name of Contact person: Mr. JAYARAMAN PACKIRISAMY Contact No: 09866722247	<input checked="" type="checkbox"/> USDA NOP
Unit Name & Address (if different from above): SRI BIOTECH LABORATORIES INDIA PVT LTD BIO DIVISION AT SURVEY NO: 321 BIOTECH PARK PHASE 3 KARAKAPATLA VILLAGE MULUGU MANDAL MEDAK DIST TELANGANA	Unit Production Capacity/Day :- 2.9 MT
1. Remarks (eg; action to be implemented immediately, reasons for extended inspection time, unit not ready for inspection etc.)	
NIL	
2. The following documents have to be send to INDOCERT (mention deadlines)	
NIL	
3. Non compliance of last inspection :	
fulfilled:	
N.A- First inspection	
<input type="checkbox"/> see annex	

Not fulfilled:**N.A- First inspection**

Please mention if there is any deviation from Organic production & handling system plan

If applicable, check whether the update production and handling system plan is available

☐ see annex ____

4. Products	correct	to improve	Not evaluated	not relevant
1. Complete list of own organic products available	√			
2. List of organic products produced through subcontracted operations available				√
3. Organic products have exclusively been produced according to subpart G, National list of allowed and prohibited substances.	√			
4. The complete list of products produced in the unit (including in conversion, conventional status) has been disclosed	√			

Remarks:
to no.:.....

1.Complete list of own organic products is available. Operator doing trading of the products produced in the processing unit.

2.There is no subcontracted activity.

3.Operator not started the trading of products. Operator planning to start the trading of products from their own organic certified processing unit.

4.Complete list of products produced in the unit has disclosed.

☐ see annex ____

5. Formulations and raw materials	correct	to improve	Not evaluated	not relevant
1. Current formulations (recipes) of all products exist. Recipes for new products have been checked. <input type="checkbox"/> In previous inspection report of year <input type="checkbox"/> In the Organic production & handling system plan <input type="checkbox"/> As given in the application form <input type="checkbox"/> At office/factory premises <input type="checkbox"/> see annex	√			
2. Only approved organic ingredients are used according to subpart G,National list of allowed and prohibited substances. <input type="checkbox"/> see annex	√			
3. Valid organic certificates for relevant standards available <input checked="" type="checkbox"/> supplies from agricultural producers (scope certificate/transaction certificate) <input type="checkbox"/> supplies from processing or marketing enterprises (scope certificate/ transaction certificate) <input type="checkbox"/> List of suppliers verified as in the Organic production & handling system plan in the appendix of the previous inspection report <input type="checkbox"/> on the factory/office premises <input type="checkbox"/> Other sources <input type="checkbox"/> <input type="checkbox"/> see annex	√			
4. Correct procurement of inland raw materials (checking of invoices and delivery notes on accepted quality of the supplied goods, as organic labels) Verified period: <input type="checkbox"/> see annex				√

5. Correct handling of the imports Import confirmation available <input type="checkbox"/> Others <input type="checkbox"/> <input type="checkbox"/> see annex				✓
Remarks: to no.:..... 1. Operator not started the trading of products. 2. Except one product (vegan natural multivitamin) rest all products are single ingredient product. 3. Scope certificate is not available at the time of inspection; operator is applied to indocert for organic processing unit certificate. 4. Operator not started the procurement. 5. No import of raw materials				
6. Labelling	correct	to improve	Not evaluated	not relev
1. The labelling of the products including purchased products ("100 percent organic," "organic," or "made with organic ") and the documentation (invoices, delivery notes, receipts) complies with USDA NOP. If not or in case of doubt describe non-compliances and add sample of label.	✓			
2. Correct labelling on delivery notes, invoices and promotion materials (including website)	✓			
3. The label of a certified organic product is correct with the <input type="checkbox"/> All product details <input type="checkbox"/> INDOCERT logo & accreditation number <input type="checkbox"/> India Organic Logo , <input type="checkbox"/> USDA NOP Logo				✓
4. Operator has Valid label approval				✓
Remarks: to no.:..... 1. Labelling of products done correctly. 2,3,4 - Operator not yet started the trading of products. Operator applied for label approval. <input type="checkbox"/> see annex				
7. Sales channel	correct	to improve	Not evaluated	not relevant
1. Sales channel are clear and traceable. List of buyers available Previous inspection report of year <input type="checkbox"/> operator information <input type="checkbox"/> Others <input type="checkbox"/>				✓
2. Correct handling of export Copy of certificate of inspection for each consignment available <input type="checkbox"/> Others <input type="checkbox"/> <input type="checkbox"/> see annex				✓
Remarks: 1. Operator not started sales. 2. No exporting done. <input type="checkbox"/> see annex				
8. Commodity flow inspection(for NOP Certified products)	correct	to improve	Not evaluated	not relevant
Commodity flow is reliable				

Single batches can be traced		<input type="checkbox"/>				
Quantities can be compared over certain period		<input type="checkbox"/>				
Commodity flows are only partially understandable		<input type="checkbox"/>				
Commodity flows are not understandable		<input type="checkbox"/>				
verified product	verified period	quantity processed/ procured	quantity sold	Balance stock		
VEGAN NATURAL MULTIVITAMIN	25/02/2015 TO 03/02/2015	NIL	NIL	NIL		
ALOEVARA JUICE		NIL	NIL	NIL		
AMLA JUICE		NIL	NIL	NIL		
JAMUN JUICE		NIL	NIL	NIL		
KARELA JUICE		NIL	NIL	NIL		
NONI JUICE		NIL	NIL	NIL		
NEEM JUICE		NIL	NIL	NIL		
VIRGIN COCONUT OIL		NIL	NIL	NIL		
COCONUT PROTEIN		NIL	NIL	NIL		
MORINGA OLIFERA EXTRACT		NIL	NIL	NIL		
ASHWAGANDA EXTRACT		NIL	NIL	NIL		
AMLA EXTRACT		NIL	NIL	NIL		
HYDROXY CITRIC ACID POWDER		NIL	NIL	NIL		
ALFA – ALFA POWDER EXTRACT		NIL	NIL	NIL		
BACOPA MONERI EXTRACT		NIL	NIL	NIL		
WHEAT GRASS POWDER EXTRACT		NIL	NIL	NIL		
LEMON GRASS POWDER EXTRACT		NIL	NIL	NIL		

Remarks:

Operator not started the organic trading of products.☐ see annex

9. Processing and storage	correct	to improve	Not evaluated	not relevant
1. Incoming-lot control exists <input type="checkbox"/> according to the previous inspection report of year <input type="checkbox"/> according to the information stated on the purchase invoice/delivery slips <input type="checkbox"/> see annex	√			
2. Current full description of processing/described process flows exist and are in compliance. <input type="checkbox"/> according to Organic production & handling system plan <input type="checkbox"/> according to the following description: <input type="checkbox"/> see annex				√
3. No use of substance /techniques that reconstitute the properties that are lost in the processing/storage of organic products that are otherwise misleading to the true nature of the product <input type="checkbox"/> see annex				√
4. Usage of accepted auxiliary processing substances, cultures of micro organisms and enzymes according to subpart G,				√

National list of allowed and prohibited substances. <input type="checkbox"/> see annex				
5. Is there sufficient precautionary measures followed during processing to avoid the risk of contamination by prohibited substances / products				√
6. No prohibited methods used in processing as per relevant standards (e.g, ionizing radiation, fumigation etc.) <input type="checkbox"/> see annex				√
7. No usage of Genetically Manipulated Organisms and their derivatives GMO free declarations concerning risk additives and auxiliary processing substances and cultures exist. <input type="checkbox"/> according to the previous inspection report of year The following products have been checked: <input type="checkbox"/> see annex				√
8. No use of prohibited substances in facility pest management according to relevant standards <input checked="" type="checkbox"/> according to operator records <input type="checkbox"/> see annex	√			
9. No use of prohibited substances as cleaning agents according to relevant standards <input type="checkbox"/> according to operator records	√			
10. Testing for GMO's and residues (as required by relevant standards) Testing for GMO's has been done <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> access to test results in the operator file <input type="checkbox"/> access to test results at the unit Testing for residues has been done <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> access to test results in the operator file <input type="checkbox"/> access to test results at the unit <input type="checkbox"/> see annex				√
11. Contract with enterprises doing subcontracted processing are present <input type="checkbox"/> Yes <input type="checkbox"/> No Have the units been inspected? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> see annex D.3.10 RE Inspection report Subcontracted unit				√
12. Contract with enterprises doing subcontracted storage are present <input type="checkbox"/> Yes <input type="checkbox"/> No Have the units been inspected? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, mention the address, floor plan and description of the unit inspected (use annex if needed)				√
13. Sufficient separation (in time and space) during processing is assured (closed cycle of operation steps) <input type="checkbox"/> according to Organic production & handling system plan <input type="checkbox"/> according to operator records <input type="checkbox"/> separation in time is followed <input type="checkbox"/> separation in space is followed <input type="checkbox"/> see annex				√
14. Proper Cleaning of all equipments/utensils before every organic processing <input type="checkbox"/> according to Organic production & handling system plan <input type="checkbox"/> according to operator records				√

15. Storage of raw materials, semi-finished goods and finished goods in such a way preventing contamination (adequate separation)	√			
<input type="checkbox"/> according to operator records <input type="checkbox"/> see annex				
16. The packaging and transport of products is complying with relevant standards	√			
<input type="checkbox"/> according to operator records				
No contamination of packaging materials with prohibited materials as per relevant standards				
17. Documentation / Records All production/handling records are available for at least 5 years	√			

Remarks:
to no

1. The incoming lot control exists.
 2,3,4,5,6,7 – Operator planning to do trading of products after getting certification for processing unit.
 8. No use of prohibited substance in pest management.
 9. No use of prohibited substance in cleaning.
 10. Testing of GMO is not done, as no GMO is used in processing.
 11. No subcontract activity for organic processing.
 12. No subcontract activity for storage of organic products
 13,14 - Only organic trading is done.
 15 Separate space is provided for the storage of organic materials in the unit .
 16. Packaging and transportation is according to the standards.
 17. All production handling documents are available for one year.

10. Risk assessment

Comingling of Organic and conventional produce	NA <input checked="" type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input type="checkbox"/>
Storage of raw materials, semi-finished goods and finished goods in such a way preventing contamination	NA <input type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input checked="" type="checkbox"/>
Usage of Prohibited inputs (food additives/ingredients) in organic Processing	NA <input checked="" type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input type="checkbox"/>
usage of Genetically Modified Organisms and their derivatives	NA <input checked="" type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input type="checkbox"/>
Proper recording of all activities	NA <input type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input checked="" type="checkbox"/>
Overall risk assessment of the operator	NA <input type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L <input checked="" type="checkbox"/>

Remarks:

Overall risk assessment is low.
Only organic trading is done in the unit.
Operator planning to do trading from their own processing unit after getting certification from INDOCERT.
Storage unit is situated in the Karakapatla Unit . Separate space is provided for storing of organic materials.

Remarks by the inspector:

Sristi Bio-Sciences Private Limited is a Natural Product Company. Operator is also doing trading activity of products produced in the processing unit . Operator having two processing unit. One of the processing unit is situated in Hyderabad (Karakapatla) and the other processing unit is in Coimbatore (Arthur). Hyderabad processing unit is under construction. Overall impression of the unit is satisfactory.

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List of products to be certified:

Sl. No.	Name of product	Recovery %	% Organic ingredients *	Production (with unit)		
				Last year	This year Estimate	Qty.in stock
1	VEGAN NATURAL MULTIVITAMIN	100 %	100 %	Nil	50 MT	Nil
2	ALOEVARA JUICE	100 %	100 %	Nil	10 MT	Nil
3	AMLA JUICE	100 %	100 %	Nil	3 MT	Nil
4	JAMUN JUICE	100 %	100 %	Nil	1 MT	Nil
5	KARELA JUICE	100 %	100 %	Nil	2 MT	Nil
6	NONI JUICE	100 %	100 %	Nil	2 MT	Nil
7	NEEM JUICE	100 %	100 %	Nil	2 MT	Nil
8	VIRGIN COCONUT OIL	100 %	100 %	Nil	500 MT	Nil
9	COCONUT PROTEIN	100 %	100 %	Nil	25 MT	Nil
10	MORINGA OLIFERA EXTRACT	100 %	100 %	Nil	3 MT	Nil
11	ASHWAGANDA EXTRACT	100 %	100 %	Nil	3 MT	Nil
12	AMLA EXTRACT	100 %	100 %	Nil	3 MT	Nil
13	HYDROXY CITRIC ACID POWDER	100 %	100 %	Nil	3 MT	Nil
14	ALFA – ALFA POWDER EXTRACT	100 %	100 %	Nil	3 MT	Nil
15	BACOPA MONERI EXTRACT	100 %	100 %	Nil	3 MT	Nil
16	WHEAT GRASS POWDER EXTRACT	100 %	100 %	Nil	3 MT	Nil
17	LEMON GRASS POWDER EXTRACT	100 %	100 %	Nil	3 MT	Nil

* Total net weight of NOP-organic ingredients (minus water and salt)

x 100

Total net weight of finished product (minus water and salt)

Appendix

The appendices marked with ☒ constitute an integral part of the inspection report.

Appendix	Item	Exact specification
<input checked="" type="checkbox"/> A	List of own organic products	Annex 1
<input type="checkbox"/> B	List of subcontracted processed products	
<input type="checkbox"/> C	Recipes	
<input checked="" type="checkbox"/> D	List of suppliers	Annex 2
<input type="checkbox"/> E	Label samples	
<input type="checkbox"/> F	Incoming-lot control procedure	
<input type="checkbox"/> G	Description of processing	
<input type="checkbox"/> H	Separation measures	
<input type="checkbox"/> I	GMO declaration	
<input type="checkbox"/> J	Analysis reports	
<input type="checkbox"/> K	Flow chart for processing	
<input checked="" type="checkbox"/> L	Floor plan	Annex 3
<input checked="" type="checkbox"/> M	Organic production and handling system plan	Annex 4
<input checked="" type="checkbox"/> N	Factory license	Annex 5

Summary of Non-Compliances:

Non compliance	Classification Major/Minor	Conditions/Measures	Time limit
<p>Nil, no non compliance found during the inspection</p>			

Declaration:

The operator confirms with his/her signature that;

- Has clearly understood all the terms mentioned in the contract signed by him and is willing to abide by them
- Has clearly understood the contents of this inspection report
- A copy of this inspection report has been received.
- He/she takes the responsibility of understanding & updating the relevant standards

The operator agrees to correct non-compliances with the USDA NOP as set by INDOCERT.

Hyderabad	04/03/2015		
Place	Date	Signature of Operator	Signature of Inspector