

30. Sanction Catalogue for NPOP and PGS

ROCO has developed Sanction Catalogue as per NPOP and PGS standards and ROCO follows sanction catalogue in the certification system.

30.1 Procedure to administer sanctions based on sanction catalogue

It is followed to detect correct sanctions for the detected non conformities

- When an irregularity is committed by the operator the entire lot or production affected by irregularity will be removed from the production chain or site and sanctions shall be imposed on the operator
- instances of Non- Compliance and active measures taken by Internal Inspection body With special Reference to Sanctions shall be assessed from the documentation,
- On detection of Non- compliance by the group or Its Individual Operators and failure to the internal control system, shall Invoke sanctions on the group. The sanctions shall also Include provisions for withdrawal of certificate of the whole group
- If the ICS sanctions farmer/s, the operator must provide list of farmers who have been Issued Sanctions with the reason and the duration of the sanction (If Relevant.)
- **Severe non-conformities or major non-conformities or infringement:** whenever the inspector detect the severe non-conformities he/she shall report to the evaluator immediately and evaluator will take appropriate action (partial suspension or withdrawal of certificate), if evaluator find it difficult to take a decision, quality manager will be involved
- **Major or severe deficiencies:** all the major non-compliances will be communicated to the operator during debriefing the inspection findings and operator has to give the correction action/sand the time taken to implement the same within 30 days. Certification decision will not be taken unless all the major nonconformities were closed.
- **Minor deficiencies or minor non-compliances:** the inspector will debrief the minor non-compliances or observations during the end of the inspection and the operator has to give the corrective action and the dead line for implementation. Certification decision will be taken even there will be a minor nonconformities in the project
- The quality manager will be the final authority to categorize the detected non-compliances before certification decision has been taken. The operator will be communicated if the certification committee makes the changes against the inspection/s categorization of the non-conformities

30.2 Explanation for each category of sanction

Noncompliance type	Nature of non compliance	Proposed sanction
OFI (Opportunity for Improvement)	<ul style="list-style-type: none"> • Doing mono cropping or not rotating crop • Soil fertility problems • Soil erosion problems • Insufficient biodiversity • Littering 	Observations of facts which are not a nonconformity yet needs to be improved
Minor	<ul style="list-style-type: none"> • Missing proof/receipt for brought-in material, • Shortage of space in storage • Missing inter cropping or cover cropping • No adequate buffer zone (if no contamination or mixing happened yet) • No message regarding changes in the organization, • No message regarding new products • Was late in submitting the missing documents (delivery documents, labels, results of analysis) • Late submission of annual cultivation plan, special permissions for the additional purchase of seeds, fodder, animals etc • No adequate separation in case of part conversion(if no contamination or mixing happened yet) 	Observation of a deviation of the standards which is not serious yet which needs to be changed
Major	<ul style="list-style-type: none"> • Previous corrective actions not yet implemented • If a minor non-compliance identified in the previous year repeats in the future as well • Intentional wrong information about previous land management • Failure to declare conventional part of farm • Lack of separation between organic 	The land have to undergo new conversion

	<p>and conventional farming part</p> <ul style="list-style-type: none"> • Use of conventional treated seeds • Use of chemical fertilisers • Treated with unknown or not allowed active ingredients • Use of chemical pesticides 	
Major	<ul style="list-style-type: none"> • Missing or not adequate records • Message regarding changes concerning production management were informed late, • Address, relevant operational changes, incomplete documentation (which made the examination more difficult) of purchase/plant production/animal husbandry/processing/storage/sales. • No adequate separation or cleaning in case of part conversion • Failure to declare parallel production • Failure to declare fields with different status • Failure to declare conventional part of farm • Lack of separation between organic and conventional farming part • Subcontractor involved but not declared and thus not inspected • Misleading labeling • Failure to declare all involved entities • In sufficient collector training and supervision • Risk of pest control 	Additional requirements on recording or reporting imposed on the operator to assure the he improved his performance or resolved the stated non-conformities
Major	<ul style="list-style-type: none"> • Provide false information to certifying agent concerning changes to the operation which effect the operation's Organic status, falsification of documentation, selling non - organic crops or products as organic. 	Termination or denial of certification or strict disciplinary action will be based on the severity of incidence.
Major	<ul style="list-style-type: none"> • In case the NC raised by last Certifier is Major & no Corrective action will 	Denial of certification.

	be taken	
Major	<ul style="list-style-type: none"> Application of prohibited materials, falsification of records concerning application of prohibited materials. Un allowed pesticides used or contact with pollutants in post harvest, processing , transport, storage, 	Termination or denial of certification or disciplinary action will be based on the severity of incidence
Major	<ul style="list-style-type: none"> If product and label profile are not completed, and ingredients certifiers details are not available. 	Product will not be listed in certificate or removed from certificate
Major	<ul style="list-style-type: none"> If operator is willfully/purposefully violating the requirements of standards, or if they fail to correct existing major noncompliance issues If operator don't respond to CB communications. 	Termination or denial of certification or disciplinary action.
Major	<ul style="list-style-type: none"> Use of treated seeds or seedlings Contamination of organic products with prohibited substances Mixing or insufficient separation of products with different certification status (in-conversion/organic or conventional/organic or in-conversion) 	Downgrading of a product, a lot or a parcel.
Major	<ul style="list-style-type: none"> Application of prohibited substances Refusal of access to the farm, company, storage. Labelling conventional products as organic or in-conversion 	Suspension or withdrawal of the contract, the licence and the certificate
Major	<ul style="list-style-type: none"> Refusal to notify certifying agent of the changes which effect the Operation's Organic Status, If ROCO receives repetitive negative feedbacks from Buyers, importing countries, certification bodies and regulatory authorities about an operator If ROCO observes repetitive residue detection from laboratories, regulatory authorities or any other reliable sources 	<ol style="list-style-type: none"> 1st Incidence- Warning letter and/or Suspension of certificate Minimum 15 days. 2nd Incidence- 30 days minimum suspension 3rd Incidence- Termination of Certificate.

		Action will be based on the severity of incidence. Special control measures/restrictions will be issued for export of organic products. Reduction of scope may be done.
Major	<ul style="list-style-type: none"> • Suspicion of use of prohibited substances • potential risk of contamination 	Additional analysis on account of the operator on inputs, soil, plants, raw materials etc.
Major	If Operator fails to submit certification fee	Late fee will be charged. Certification may be denied or Termination of Certificate

Note : if few points listed in multiple cases consider depends on severeness.

Only the Certification Committee or the Appeals Committee can impose sanctions. If the same non-conformity should happen again, the sanction imposed will be more severe.

The operator will be informed about the sanctions in writing after the CC decided on the certification. If a sanction imposed include downgrading of a product, a lot or a parcel or suspension or withdrawal of the contract, the licence and the certificate, the letter informing the operator shall be sent.