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As per ISO 17065:2012 Clause 7 – Process Requirements (7.11- Termination, Reduction, Suspension or withdrawal of certification)

## **Disciplinary measures and Sanctions**

GreenCert has a documentary range of disciplinary measures (sanctions) including measures to deal with minor and major infringements of the standards.

In case of grower group , sanction is applied to the entire Grower group where incase of representative sample of farmers, which shows that ICS has failed to comply with the certification norms applicable to Grower Group.

## **Noncompliance Identification**

Non-compliances may arise during routine inspections, unannounced surveillance audits, document reviews or residue testing. If GreenCert has reason to believe that a certified operation has wilfully violated the NPOP standards GreenCert shall send the certified operation a notification of suspension or termination, as applicable to the noncompliance.

Upon identification of Non Compliance during inspection, GreenCert inspection officer begins documentation of the noncompliance and informs the operator of the issue in writing, explaining the specific clause(s) of the standard that have been breached. Operators are expected to cooperate and participate in the resolution process.

## **Non-Conformity Closure**

Once a noncompliance is identified, the operator is required to submit, in writing, a proposed corrective action plan that addresses the root cause of the noncompliance and outlines steps for resolution.

Depending on the severity of the noncompliance, GreenCert follows two verification pathways:

1. For major non-compliances, GreenCert conducts a surveillance inspection to ensure the operator has implemented effective corrective measures and to evaluate whether organic integrity has been restored.
2. For minor non-compliances, verification is conducted during the next scheduled annual inspection.

Operators are required to close nonconformities within the following timeframe:

- Minor noncompliance – within 60 days from the date of inspection
- Major noncompliance – within 30 days from the date of inspection

Failure to respond or close the noncompliance within the stipulated period may result in suspension.

If GreenCert observes that minor NC is repeated multiple times, then it has provision to upgrade it from minor to major. If still same discrepancies are observed then it may lead it withdrawal or suspension or withdrawal of the project.

## **Suspension of Certification**



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Operation is suspended when a certified operation fails to correct identified non-compliances within the stipulated closure timeline, or if the noncompliance is such that it affects the integrity of the organic product. Suspension is also imposed in cases of shallful violation or negligence, where immediate action is necessary to safeguard the credibility of the certification system.

Suspension may be imposed by GreenCert for the following durations:

- 30 days
- 90 days
- Until the expiry of the current scope certificate

Suspension is effective immediately from the date the operator receives the suspension notice or the official issuance date of the notice, whichever comes first.

The suspension notice is issued on official GreenCert letterhead and is formally communicated by the Admin In-charge, based on the decision of the Certification Committee consisting of the Quality Manager (QM), Certification Manager (CM), and Certification Executive (CE).

The notice includes the following information:

- Specific reasons for the suspension
- The effective date of suspension
- The evidence or corrective measures required for reinstatement of certification

During the suspension period:

- The operator is not allowed to market, sell, label, or represent any product as organic.
- No Transaction Certificates (TCs) shall be issued for the suspended products.
- The operator must cease using the GreenCert and India Organic logos.

GreenCert may conduct a re-verification audit during the suspension period to assess whether corrective actions have been effectively implemented and whether organic integrity has been maintained.

If the re-verification audit confirms compliance and integrity, the suspension may be revoked, and certification may continue.

If the verification audit reveals ongoing non-compliances or further violations, the suspension shall result in termination of certification.

## **Termination of Certification**

Criteria for Termination

- There is deliberate fraud, falsification of records, or misrepresentation
- Organic integrity is irreversibly compromised
- There are repeated noncompliance's, especially after prior suspensions



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- The operator fails to resolve issues during the suspension period

Termination is immediate and effective from the date of issuance or receipt of the termination notice. Termination is decided by the Certification Committee (QM, CM, CE) and formally issued on GreenCert letterhead by the Admin In-charge.

A terminated operator is barred from reapplying for certification for a minimum period of 2 years from the date of termination. This period may be extended based on the severity and nature of the violation. The Termination decision is communicated to the operator, uploaded to TraceNet, and a copy is submitted to APEDA.

### **Withdrawal of Certification:**

When an infringement that affects organic integrity is found, GreenCert ensures that the non-compliant lot production is removed from the entire lot of production cycle which is affected by the particular infringement. In case of any violation by the Operator, GreenCert withdraw certification from the Operator for a specified period in case serious non compliances affecting the organic integrity are observed. In case of severe infringement or repeated violations of the NPOP norms, the certification of the Operator shall be terminated. and the decision inform to APEDA & the same need to be upload on TraceNet.

### **Denial of Certification**

Denial of certification applies to new applicants or operations under initial review where, after inspection and evaluation, the Certification Committee concludes that the applicant fails to meet NPOP criteria.

In such cases, GreenCert sends an email communication to the applicant explaining the grounds for denial and referencing the specific standards or criteria not met.

Denial does not prevent the operator from reapplying in the future once the identified issues are addressed.

### **Notice of Removal of Non-Compliant Lot**

In cases where noncompliance results in contamination (such as detection of prohibited substances or residues), GreenCert issues a notice for removal of the entire affected lot from trade.

The operator must remove the identified lot from any organic marketing channels. Compliance is verified through:

- In-out quantity reconciliation
- Monitoring of TC applications
- On-site physical inspections
- Document audits and traceability checks

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The lot must be clearly segregated, marked, and documented to prevent mislabeling or accidental sale as organic. The lot may be sold as conventional.

## Appeals Process

Any operator who disagrees with a decision made by GreenCert may file an appeal. The following decisions are subject to appeal:

- Denial of certification
- Suspension of certification
- Withdrawal of certification
- Termination of certification

The appeal must be submitted in writing, with justification and relevant supporting documents, as per the Appeals Procedure outlined in OM 23. Appeals are reviewed by the Appeals Committee, which is independent of the Certification Committee. The committee's decision is final and communicated to the operator in writing. If the appeal is rejected, the original decision remains in effect.

**Conditions During Withdrawal of Certification (Suspension or Termination)-** Operators whose certifications are suspended, withdrawn, or terminated must:

- Cease all marketing, sales, or claims relating to organic products
- Remove GreenCert and India Organic logos from all materials, packaging, and documentation
- Halt issuance and use of Transaction Certificates (TCs)
- Ensure that affected lots are not labelled or traded as organic in any form

Failure to comply with these restrictions during or after the sanction period may result in legal action and reporting to relevant regulatory authorities.

## Public Disclosure and Communication with APEDA

GreenCert ensures full transparency and traceability by maintaining an updated list of suspended, withdrawn, and terminated operations on its official website.

Simultaneously, the following documents are submitted to APEDA at the time of issuance:

- Notice of denial of certification issued to the client
- Notification of major non-compliance(s)
- Notification of non-compliance correction(s)
- Notification of suspension, withdrawal, or termination sent to the operator

These actions are taken to uphold the credibility and integrity of India's organic certification system, and to ensure public trust in certified organic products.