



United States Department of Agriculture

Agricultural Marketing Service
National Organic Program

CERTIFICATE OF ACCREDITATION

ONECERT INTERNATIONAL PRIVATE LIMITED

H-274, RIICO Industrial Area, Sitapura, Jaipur, Rajasthan, 302022, INDIA

meets all the requirements prescribed in the USDA National Organic Program Regulations

7 CFR Part 205

as an Accredited Certifying Agent

for the scope of

Crops, Handling, Livestock, Wild Crops Operations

This certificate is receivable by all officers of all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the regulatory laws enforced by the U.S. Department of Agriculture .

Status of this accreditation may be verified at <http://www.ams.usda.gov>

Certificate No: **USDA-60-22**

Effective Date: **05/28/2019**

Expiration Date: **05/28/2024**

Issue Date: **05/25/2022**

Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program



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NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted an audit as part of NOP's assessment of the certifier's organic program. This report provides the results of NOP's review of the certifier's corrective actions and assessment of the certifier's capability to operate as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	OneCert International Private Limited OCI
Physical Address	H-8 Mansarovar Industrial Area, Mansarovar, Jaipur, Rajasthan 302020
Mailing Address	H-8 Mansarovar Industrial Area, Mansarovar, Jaipur, Rajasthan
Contact & Title	Mr. Sandeep Bhargava
E-mail Address	sandeep@onecertasia.com
Phone Number	+91-141-6541883
Reviewer(s) & Auditor(s)	Penny Zuck, Melissa Lahullier, NOP Reviewers; Jessica Walden, Penny Zuck, Onsite Auditors;
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	NOP assessment review: April 24 through November 3, 2020 Onsite audit: March 2-13, 2020
Audit Identifier	NOP-4-20
Action Required	No
Audit & Review Type	Initial Assessment and Accreditation Scope Extension
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OCI's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>

NOP conducted an onsite Initial Audit of Onecert International (OCI) March 2-13, 2020. This audit included the assessment for the additional scope of Wild Crops for accreditation. OCI is registered as a Private Limited Registered Company under the "Registration of Companies Act"-2013 in the State of Rajasthan in India.

OCI was initially accredited as a USDA certifying agent on May 28, 2019. OCI's accreditation scopes are Crops, Handling, and Livestock. Their current accreditation period will expire on May 28, 2024. OCI's office is located in Jaipur, Rajasthan, India. OCI's list of certified operations at the time of the assessment consists of 103 operations: Crops (42), Handler/Processor/Trader/Brokers (60), and Livestock (0). OCI certifies 24 Grower Groups outside of India. Certification services are provided to operations in the following countries: Cambodia, China, Ethiopia, Hong Kong, India, Indonesia, Mozambique, Nepal, Samoa, Sri Lanka, Thailand, Uganda, United Arab Emirates and Vietnam.

OCI's staff consists of 34 individuals: CEO (1), Director (1), Certification Specialist (1), Reviewers (14), Inspectors (20), Quality Assurance (2), Administration (2), and Accounting (2). Some staff are both reviewers and inspectors.

As part of the onsite accreditation audit activities, one witness audit was conducted of a Crop, Wild Crops, and Handling operation of herbs distilled into oils located in Nepal. Two inspectors were witnessed during the inspections of this operation. One inspector conducted the Crops and Wild Crops scopes and the other inspector conducted the Handling scope.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether OCI's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "**Accepted**" indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

Non-compliances from Prior Assessments

AIA-403-20 - Cleared

AIA-404-20 - Cleared

AIA-405-20 - Cleared

AIA-406-20 - Cleared

AIA-407-20 - Cleared

AIA-408-20 - Cleared

AIA-409-20 - Cleared

AIA-410-20 - Cleared

Non-compliances Identified during the Current Assessment

AIA-533-20 - Accepted 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *OCI’s Crop and Wild Crops organic system plan forms do not demonstrate that OCI fully complies with the requirements of §205.201(a)(3). The forms do not require operators to provide a description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented.*

Corrective Action: OCI updated their Crops and Wild Crops organic system plans (OSPs) to include a question asking the operator to describe how they monitor their practices and procedures to verify that the OSP is effectively implemented. The updated Crops and Wild Crops OSPs were submitted for NOP review.

AIA-534-20 - Accepted 7 C.F.R. §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;”

Comments: *OCI does not adequately train personnel to comply with and implement its USDA organic certification program. The auditors observed the following:*

- 1. OCI’s material review process does not include the review of adequate technical information for materials such as nonorganic ingredients, pest control materials, sanitizers and inputs. The MSDS information requested by OCI for material review does not provide full disclosure of ingredients, National List annotation verification, or use-instructions.*
- 2. Inspectors are not conducting adequate in/out balances to determine whether the certified operation maintains records that fully disclose all activities and transactions in sufficient detail as to be readily understood and audited. Review of several inspection reports found that in/out balance exercises simply restate the information that was reported in the traceback exercise; crop yield estimates are not verified at inspection; and ingredients used in processed products are not reconciled with organic products produced.*

Corrective Action: OCI implemented the following corrective actions to address the noncompliance:

1. OCI conducted staff retraining on May 30, 2020. The training covered OCI’s *Input Evaluation Policy* as well as OCI’s *Producer input Evaluation Procedures*. OCI submitted the agenda and attendee list for the training.
2. OCI carried out staff training on product reconciliation and in-out balances on May 8, 2020. OCI’s policy requires that mass balance activities must be carried out at each inspection. In cases where there are multiple producers or handlers involved in the same company, OCI is requiring that a mass balance exercise be conducted for each operator, as well as for the managing company. A copy of the mass balance training lesson and agenda was provided to NOP for review.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a pre-decisional on-site assessment of the OneCert International Private Limited (OCI) organic program on July 30 - August 3, 2018. The National Organic Program (NOP) reviewed the auditor's report to assess OCI's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	OneCert International Private Limited
Physical Address	H-8 Mansarovar Industrial Area, Mansarovar, Jaipur, Rajasthan 302020 INDIA
Mailing Address	H-8 Mansarovar Industrial Area, Mansarovar, Jaipur, Rajasthan 302020 INDIA
Contact & Title	Mr. Sandeep Bhargava, CEO
E-mail Address	sandeep@onecertasia.com
Phone Number	+91 141 6541883
Reviewer(s) & Auditor(s)	Bridget McElroy, NOP Reviewer; Penny Zuck, On-site Auditor(s).
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Actions Review: February 28 - March 6, 2019 NOP assessment review: September 28, 2018 Onsite audit: July 30 – August 3, 2018
Audit Identifier	NOP 96-17
Action Required	Yes
Audit & Review Type	Pre-Decisional Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OCI's certification
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended.</i>
Audit & Review Scope	OCI's implementation of USDA NOP certification services.

OCI is registered as a Private Limited Registered Company under the "Registration of Companies Act"-2013 in the State of Rajasthan in India.

OCI is applying for USDA accreditation for the following scopes: crops, livestock, and handling. OCI is currently accredited by the government of India under the US – India Recognition Agreement to certify crops, wild crops, and handling operations in India to the NOP. As a result, OCI's USDA accreditation application for the crops and handling scopes is only for the

certification of crops operations located outside of India and for handling operations located in India, the certification of products not covered under the US – India Recognition Agreement.

OCI conducts business out of Jaipur, Rajasthan, India. OCI currently conducts NOP inspections for OneCert, Inc. in the following countries: India, Nepal, Vietnam, Thailand, Samoa, Uganda, Ethiopia, UAE, Tanzania, Singapore, Mozambique, Bangladesh, China, Oman, Sri Lanka, and Saudi Arabia. OCI's NOP certification staff consists of 19 personnel including 5 Administrative staff and 14 Technical staff.

Three witness audits were conducted as part of the pre-decisional audit. NOP auditors observed one announced annual inspection of a crop operation (tea production) in Thailand; one announced annual inspection of a handling operation (tea collection and processing) in Thailand; and one announced initial inspection of a livestock operation (poultry) in Hyderabad, India.

NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether OCI's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the onsite audit to determine whether noncompliances should be issued to OCI.

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Accepted**" indicates acceptance of the corrective actions and verification of the implementation of those corrective actions will be conducted during the next onsite audit.

Noncompliances from Prior Assessments

NOP4317.NC1 – Cleared.
NOP4317.NC2 – Cleared.
NOP4317.NC3 – Cleared.
NOP4317.NC4 – Cleared.
NOP4317.NC5 – Cleared.
NOP4317.NC6 – Cleared.
NOP4317.NC7 – Cleared.
NOP4317.NC8 – Cleared.
NOP4317.NC9 – Cleared.
NOP4317.NC10 – Cleared.
NOP4317.NC11 – Cleared.
NOP4317.NC12 – Cleared.

Noncompliances Identified during the Current Assessment

NOP-96-17.NC1 – Accepted. 7 C.F.R. § 205.403(d) states, "Exit interview. The inspector must conduct an exit interview The inspector must also address the need for any additional information as well as any issues of concern."

Comments: *During the witness audit of an annual inspection of a handling/processing operation, the auditor observed that the inspector did not address potential noncompliances resulting from the inspection as issues of concern. Instead, the inspector inappropriately expressed the issues as an observation or comment. The operation's potential noncompliances included not maintaining records of daily cleaning; not providing updated facility maps and process flow diagrams with the annual organic handling system plan update submission; and not having a current supplier organic certificate on file.*

Corrective Action: OCI submitted evidence that inspectors were given a refresher training in February 2019 that reviewed identification of issues of concern and noncompliances. OCI has also revised its exit interview form to include instructions requiring inspectors to include citations for each issue of concern identified. OCI has revised and circulated updated inspection instructions emphasizing that inspectors note unreported changes to the OSP as issues of concern.

NOP-96-17.NC2 – Accepted. 7 C.F.R. § 205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part; ...”

Comments: *During the witness audit of an annual inspection of a handling/processing operation, the auditor observed that the inspector did not verify all production and storage areas of the operation for compliance. Areas not inspected included the sorting room and raw materials storage area at the roasting facility; entire storage facility next to the roasting facility; and raw material receiving/finished goods exiting area at the processing/packaging facility.*

Corrective Action: OCI has revised and circulated updated inspection instructions which state that inspectors must physically visit all areas of an organic operation and verify that they are consistent with the information on the OSP and maps. OCI has also implemented onsite inspection checklists that need to be completed by the inspector during the inspection to ensure and all areas of the operation are verified.

NOP-96-17.NC3 – Accepted. 7 C.F.R. § 205.403(c)(2) states, “The onsite inspection of an operation must verify: That the information, including the organic production and handling system plan, provided ... accurately reflects the practices used or to be used by the certified operation”

Comments: *During the witness audit of an annual inspection of a handling/processing operation, the auditor observed that the inspector did not fully verify the accuracy of the information on the operation's organic handling system plan. Examples of information that was not verified for accuracy included the operation's warehouse map; processing/packaging facility map; exterior/interior pest management map; and equipment list.*

Corrective Action: OCI has revised and circulated updated inspection instructions which instruct inspectors that OSP verification must be an active and central part of the inspection and inspection report. OCI has also implemented the use of onsite inspection checklists, which incorporate verification of the key sections of the OSP.

NOP-96-17.NC4 – Accepted. 7 C.F.R. § 205.403(c)(2) states, “The onsite inspection of an operation must verify: That the information, including the organic production and handling

system plan, provided ... accurately reflects the practices used or to be used by the certified operation”

Comments: *During the witness audit of an annual inspection of a crops operation, the auditor observed that the operation’s organic production system plan included a general map of the operation’s 16 “fields” (i.e. areas) and separate maps for each area. The inspector limited the onsite inspection to visits of only 5 out of 16 areas, while only verifying the accuracy of the general map. The inspector did not verify the accuracy of the maps of each area.*

Corrective Action: OCI has revised and circulated updated inspection instructions which state that inspectors must physically visit all sites of an operation to verify each map. OCI has also implemented the use of onsite inspection checklists that require the inspector to provide the GPS reading of each location verified and describe characteristics such as adjoining land use and buffer zones.

NOP-96-17.NC5 – Accepted. 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:...” Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2027, “Personnel Performance Evaluation,” Section 3.2b states, “The field evaluation system should be developed using best practices, such as a risk-based approach (i.e., inspector experience, annual number of inspections, work product assessment, etc.) or another approach sufficient to determine inspector competency. Inspectors who have demonstrated full competency may be field evaluated less regularly but still require an annual performance evaluation.”

Comments: *The auditor found that OCI does not have a documented policy on conducting field evaluations of inspectors. An interview with OCI staff indicates that OCI uses a risk-based system to determine frequency of field evaluations, but the policy/procedure is not documented.*

Corrective Action: OCI updated its Personnel Policies document to state that field evaluations will be performed annually for all inspectors, unless an alternate plan is agreed to by OCI and the NOP.

NOP-96-17.NC6 – Accepted. 7 C.F.R. §205.406(a)(3) states, “To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to the certifying agent:... An update on the correction of minor noncompliances previously identified by the certifying agent as requiring correction for continued certification;...”

Comments: *The auditor found that OCI’s Annual Update forms do not require certified operations to report on correction of minor noncompliances previously identified by the certifier as requiring correction for continued certification.*

Corrective Action: OCI submitted revised Annual Update Forms for Handlers and Producers that include a section where the operator must provide an update on the correction of minor issues and noncompliances.

NOP-96-17.NC7 – Accepted. 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:...” Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP Policy Memo 11-10, “*Grower Group Certification*,” refers to the 2008 National Organic

Standards Board (NOSB) Recommendation which provides the criteria for the certification of grower groups:...

- The certifying agent must have policies and procedures for determining how many of the sub-units within a production unit must receive an annual inspection by the certifying agent. In addition to the mandatory inspection of new entrants to the production unit, the certifying agent must also have policies and procedures for determining which sub-units present the greatest risks of non-compliance. Various risk assessment methods are used to both determine sample size and select the appropriate sub-units to examine.

Comments: *The auditor found that OCI's current grower group policy does not demonstrate that OCI complies with the requirement to conduct inspections of all new entrants to the production. Instead, OCI includes new entrants in the total number of members as part of their risk-based and random selection procedures.*

Corrective Action: OCI submitted a revised Grower Group Inspection Policy which states that OCI will conduct inspections of all new entrants to the grower group, in addition to inspections of other members based on risk and random selection.

NOP-96-17.NC8 – Accepted. 7 C.F.R. § 205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart; Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” The NOP website provides instructions and the terms of international trade arrangements.

Comments: *OCI does not have procedures for reviewing an operation's compliance with the terms of the US-Canada Equivalency Arrangement.*

Corrective Action: OCI submitted an updated Certification Procedures document that includes the procedures OCI will use (once accredited) for reviewing an operation's compliance with the terms of the U.S.-Canada Equivalency Arrangement.