



CERTIFICATE OF ACCREDITATION



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

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-1-24**

Effective Date: **05/28/2024**

Expiration Date: **05/28/2029**

Issue Date: **01/18/2024**

Jennifer Tucker, Ph.D.

Deputy Administrator

National Organic Program

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National Organic Program
1400 Independence Avenue, SW.
Room 2642-South, STOP 0268
Washington, DC 20250-0268

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

Certifier Name	OneCert International Private Limited, (OCI)
Physical Address	H-274, RIICO Industrial Area, Jaipur, Rajasthan 302022, INDIA
Audit Type	Compliance Audit
Auditor(s) & Audit Dates	Lars Crail, Alicia Hudson, Jonathan Surrency, Joshua Lindau, 10/16/2023 to 11/08/2023
Audit Identifier	NOP-441-23

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted surveillance activities in India October 16 – November 8, 2023, to verify OneCert International Private Limited's (OCI) compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook, with a focus on organic export supply chains. Audit activities included a review of certification files, onsite audit activities at certified operations, and product sampling and analysis for pesticide residue.

OCI is a for-profit company initially accredited on May 28, 2019. OCI's primary office is in Jaipur, India. OCI is accredited to the crops, wild crops, livestock, and handling categories. OCI currently certifies 643 operations including producer groups in India.

NOP DETERMINATION:

NOP reviewed any corrective actions submitted as a result of noncompliances issued from findings identified during the audit.

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.

Noncompliances from Prior Assessments

None

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-1260-24 - Accepted. 7 C.F.R. §205.404(b)(1) – (4) states, “The certifying agent must issue a certificate of organic operation which specifies the: Name and address of the certified operation; Effective date of certification; Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and Name, address, and telephone number of the certifying agent.”

Comments: *OCI’s organic certificates are missing the required elements identified in NOP 2603 Organic Certificates. The auditors reviewed OCI certificates and found that more than one person is listed on the certificate. Interviews with OCI staff found that OCI included the name and address of a separate warehouse under the ‘physical address’ section of a certified entity’s organic certificate, instead of the physical address of the certified entity. The warehouse is owned/leased by the certified entity but is a separate ‘person’ as defined by § 205.2.*

Corrective Action: OCI updated the certificate of the impacted operation to list one legal entity. OCI reviewed the organic system plan of the operation to ensure the operation complies with **NOP 2603**. In addition, OCI is conducting an analysis to verify if any additional certified operations list more than one legal entity and will rectify the organic certificate accordingly.

AIA-1261-24 - Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.

Comments: *OCI does not ensure that its inspectors have sufficient training to perform their inspection duties. The auditor’s review of certification files found that OCI assigned an inspector to an inspection of a complex handling operation without sufficient training. According to the inspector’s training records and qualifications, the inspector had no previous organic experience prior to being hired by OCI three months earlier and had only received minimal in-classroom training prior to conducting the inspection of the complex handling operation. Additionally, OCI conducted a field evaluation of the inspector at the inspection of the complex handler and identified deficiencies with the inspector’s review of the operation and knowledge of the USDA organic regulations.*

Corrective Action: OCI updated the Induction Training Program which was implemented in September of 2023. Based on the training program, a new inspector will receive “in-class training” followed by “observation audits” and “under supervision audits” where a trainee inspector does the inspection under the supervision of an approved inspector. OCI will then conduct a witness inspection in order to approve the inspector to conduct inspection independently. In addition, the auditor without sufficient training identified at the audit is no

longer employed by OCI.

AIA-1262-24 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *OCI does not carry out the provisions of the Act and the regulations. The auditors conducted a review audit and reviewed certification files and found that OCI does not verify whether organic system plans (OSP) are accurate, complete, and meet the requirements of § 205.201(a). The following are examples:*

- 1. OCI did not require an operation to provide a description of relabeling practices and procedures. An OCI inspection report noted that the operation relabels organic products, but the OSP did not contain information regarding these practices.*
- 2. OCI did not require an operation’s OSP to describe which agricultural production or handling practices occur at each location listed in the OSP. Therefore, it could not be verified which activities were occurring at which location.*

Corrective Action: OCI determined that the OSP identified as incorrect at the audit was accurate; the relabeling activities were being performed by a sister company of the operation being inspected and the sister company operates under its own organic certification. OCI updated its organic system plan template to now include a description of activities that occur at the primary location and a description of activities that occur at other locations, which was implemented May 17, 2024. OCI notified staff of the updates via email on May 17, 2024.

AIA-1263-24 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *OCI does not carry out the provisions of the Act and the regulations. OCI does not always ensure that the information listed on its NOP Import Certificates is correct. The auditor reviewed NOP Import Certificates issued by OCI and found that the documents listed incorrect harmonized tariff codes and did not correctly identify the number of shipping containers for each shipment.*

Corrective Action: OCI updated its NOP Import Certificates Procedure and implemented it on May 3, 2024. The procedure includes a step where staff identify the appropriate harmonized tariff code (HTC) from the government website. OCI also updated its organic product list template to include a column for the HTC for consistency when issuing import certificates which was implemented on May 3, 2024. OCI notified staff of the updates via email on May 3, 2024.



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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** OneCert International Private Limited (OCI)
- **Physical Address** H-274, RIICO Industrial Area, Jaipur, Rajasthan 302022, INDIA
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Jessica Walden, Lars Crail, Samuel Schaefer-Joel, 03/06/2023 to 03/18/2023
- **Audit Identifier** NOP-233-23

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an on-site renewal audit of OneCert International Private Limited (OCI)'s certification activities during the period March 14, 2020, to March 5, 2023. The purpose of the audit is to verify OCI's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), the requirements of the NOP Handbook, and the implementation of the NOP's March 2022 directive to certifiers operating in India. Audit activities included a review of certification activities, interviews with OCI personnel, a records audit, three onsite witness audits and two review audits. Witness and review audits consisted of one additional inspection of a producer grower group, two annual inspections of certified handling operations and two review audits of certified handling operations. The NOP also visited a port of export.

OCI is a limited liability company and was initially accredited on May 28, 2019. OCI's main office is in Jaipur, Rajasthan, India. OCI is accredited to the following scopes: Handling, Crops, Livestock, and Wild Crops.

OCI certifies 769 operations to the following certification scopes: Crops (387, 232 of which are producer groups), Livestock (0), Handling (372), and Wild Crops (10). Certification services are conducted in 25 countries.

Certification activities are performed by 59 employees and one contractor. OCI's certification personnel work at the Jaipur office and remotely.

NOP DETERMINATION:

NOP reviewed the 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 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 “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

Noncompliances from Prior Assessments

AIA-1496-22 - Cleared.

AIA-533-20 - Cleared.

AIA-534-20 - Cleared.

AIA-6537-21 - Cleared.

Noncompliances Identified during the Current Assessment

AIA-4014-23 - Accepted. 7 C.F.R. §205.663 states, “Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent. If the certifying agent rejects the request for mediation, the certifying agent shall provide written notification to the applicant for certification or certified operation. The written notification shall advise the applicant for certification or certified operation of the right to request an appeal, pursuant to §205.681, within 30 days of the date of the written notification of rejection of the request for mediation. If mediation is accepted by the certifying agent, such mediation shall be conducted by a qualified mediator mutually agreed upon by the parties to the mediation. If a State organic program is in effect, the mediation procedures established in the State organic program, as approved by the Secretary, will be followed. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session. If mediation is unsuccessful, the applicant for certification or certified operation shall have 30 days from termination of mediation to appeal the certifying agent's decision pursuant to §205.681. Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and the regulations in this part. The Secretary may review any mediated agreement for conformity to the Act and the regulations in this part and may reject any agreement or provision not in conformance with the Act or the regulations in this part.”

Comments: *OCI's settlement agreements do not consistently comply with the requirements of the USDA Organic Regulations. The auditors' review of settlement agreements established by OCI found that they do not consistently include a defined period of time by which the terms must be completed.*

Corrective Action: OCI implemented a settlement agreement template on June 2, 2023 that requires a timeframe for each settlement term. OCI advised staff to use the new template on June 2, 2023 via email. OCI's staff responsible for drafting settlement agreements completed the Organic Integrity Learning Center training “Advanced Compliance and Enforcement Topics” on June 2, 2023.

AIA-4015-23 - 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 does not fully implement the NOP’s international organic trade arrangement policies and procedures, which are outlined in the NOP’s webpage, International Trade Policies resources. The auditors reviewed certification files and identified the following issues:*

1. *OCI does not verify the compliance of organic ingredients for products exported to Canada.*
2. *OCI’s inspection report templates do not ask the inspector to verify an operation’s compliance with the terms of the US-Canada Organic Equivalency Arrangement.*
3. *OCI’s procedures do not describe what is required of their inspectors, reviewers, or certified operations to comply with the requirements of the US-Canada Organic Equivalency Arrangement.*

Corrective Action: OCI developed guideline document, OCI-353, on June 1, 2023 which describes the compliance requirements of organic ingredients for products exported to Canada and what is required of inspectors, reviewers and certified operations to comply with the US-Canada Organic Equivalency Arrangement. OCI developed and implemented an application and verification form, OCI-354, on March 30, 2023 which will be required for all applicants and certified operations to verify the terms of the US-Canada Organic Equivalency Arrangement. OCI developed and implemented an additional verification form, OCI-355, on March 30, 2023 which will be used to obtain additional compliance information from other suppliers within a supply chain. OCI advised staff of the new forms and associated requirements on June 2, 2023 via email.

AIA-4016-23 - 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: *The auditors’ review of one certification file found that OCI had approved retail labels where the statement, "Certified organic by * * *" was not located below the information identifying the handler or distributor of the product.*

Corrective Action: OCI has notified the operation of the noncompliant labels and voided them as of March 24, 2023. OCI approved compliant labels on December 30, 2023. OCI conducted a training on labeling requirements on May 29 to May 30, 2023. OCI advised staff of the compliant labeling practices on June 2, 2023 via email.

AIA-4017-23 - 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 does not demonstrate the ability to fully comply with the requirements for accreditation. The auditors’ review of certification files and interviews with staff identified the following issues:*

1. *OCI issued a notice of noncompliance that incorrectly stated that the certified products may not be sold as organic while the case is investigated and that the products must be sold as conventional.*
2. *OCI issued notices of noncompliance to two certification applicants that incorrectly stated OCI would issue a notice of proposed suspension if the operation did not respond to the notice of noncompliance.*
3. *OCI issued a combined notice of noncompliance and proposed suspension that incorrectly provided the operation with an opportunity to submit corrective actions.*

Corrective Action: OCI conducted a refresher training on Adverse Actions on April 29, 2023. OCI staff were instructed to not deviate from the drafted adverse action templates on June 2, 2023 via email. OCI’s staff responsible for adverse actions completed the Organic Integrity Learning Center

training “Advanced Compliance and Enforcement Topics” on June 2, 2023.

AIA-4018-23 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

Comments: *OCI does not carry out the provisions of the Act and the regulations. The auditors' review of certification files found that OCI did not require a handler operation to provide documentation demonstrating a non-organic ingredient listed on §205.606 was not commercially available in organic form.*

Corrective Action: OCI reminded all handling staff to utilize OC-250 Commercial Availability Search Form when any non-organic ingredient is in use on June 2, 2023 via email. OCI's staff responsible for handling certification files completed the Organic Integrity Learning Center training “Input Material Review” by June 6, 2023.

AIA-4019-23 - 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 inspectors do not fully verify the accuracy of an operation's organic system plan (OSP). The auditors' witness audits, review audits, and review of certification files and found that OCI inspectors do not consistently identify inaccurate or incomplete OSPs as issues of concern. OCI inspectors described the operation's activities and ingredient suppliers in the inspection report. However, they did not identify that these activities and suppliers were missing from the OSP as an issue of concern.*

Corrective Action: OCI updated form “Handling OSP and Forms – Inspecting for OneCert,” on February 2, 2023 which states that any updates to the OSP form or associated OSP lists should be noted on the document, initialed by the client, returned to the inspector and then returned to OCI. OCI advised all inspectors that each section of the OSP must be verified during the inspection on June 2, 2023 via email.

AIA-4020-23 – Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

Comments: *OCI does not carry out the provisions of the Act and the regulations. OCI issued a notice of noncompliance to a handling operation for a positive residue detection and incorrectly accepted corrective actions submitted by the handling operation's supplier. OCI did not require the handling operation to submit their own corrective actions.*

Corrective Action: OCI staff were instructed to only accept corrective actions and investigations from the certified operation on June 2, 2023 via email. OCI's staff responsible for adverse actions completed the Organic Integrity Learning Center training “Evaluating an Operation's Corrective Actions to Noncompliances” by June 6, 2023.

AIA-4021-23 – Accepted. 7 C.F.R. §205.403(e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

Comments: *OCI does not consistently send operations a copy of their inspection report following the on-site inspection. The auditors' review of certification files and interviews with staff found that OCI sends operations that receive unannounced inspections because of an investigation a copy of the exit interview, but not the complete inspection report.*

Corrective Action: OCI developed a modified inspection report template, OCI-271, which will allow OCI to send the inspection report to the operation following an on-site inspection. OCI communicated to staff on June 2, 2023 that all unannounced or additional inspections that are done for investigations should have the OCI-271 form completed in addition to the investigation report, which will be shared with the operation following the inspection.



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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	7 CFR Part 205, National Organic Program as amended

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@oncertasia.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.